BELLSOUTH COMMENTS

WC Docket No. 04-313
CC Docket No. 01-338

October 4, 2004

Attachment 2

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Unbundled Access to Network Elements	)	WC Docket No. 04-313
	)	
Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers	)	CC Docket No. 01-338
	)	
	)	

AFFIDAVIT OF KENNETH L. AINSWORTH, W. KEITH MILNER, AND ALPHONSO J. VARNER ON BEHALF OF BELLSOUTH TELECOMMUNICATIONS INC. ("BELLSOUTH")

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Being of lawful age, and duly sworn upon my oath, I do hereby depose and state:

I. PROFESSIONAL EXPERIENCE

1. My name is Ken L. Ainsworth. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. My title is Director – Interconnection Operations for BellSouth. I have over thirty-five years experience in the telecommunications industry. My experience covers a wide range of network centers as well as outside plant construction. Specifically, I have managed and/or supported the following network centers: Switching Control Center, Special Service Center, Central Office Operations, Access Customer Advocate Center, Facility Management Administrative Center, Circuit Order Control Center, Network Operations Center, Major Account Center, 911 Center and the Customer Wholesale Interconnection Network Services ("CWINS") Center. In addition, I deployed the Work Force Administration ("WFA") system, which is used by these centers to track the status of certain activities performed by BellSouth's Network personnel. I am currently a Director for Interconnection Services directly supporting the Local Carrier Service Center ("LCSC") and CWINS Centers regarding pre-ordering, ordering, provisioning and maintenance activities for the wholesale market. I have participated in and provided technical assistance to numerous Competitive Local Exchange Carrier ("CLEC") workshops for pre-ordering, ordering, provisioning and maintenance of resold services and unbundled network elements.

2. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Assistant Vice President – Interconnection Operations for BellSouth. I have served in my present role since February 1996. My business career spans over 34 years and includes responsibilities in the areas of network planning,

engineering, training, administration, and operations. I have held positions of responsibility with a local exchange company, a long distance company, and a research and development company. I have extensive experience in all phases of telecommunications network planning, deployment, and operations in both the domestic and international areas. I graduated from Fayetteville Technical Institute in Fayetteville, North Carolina in 1970, with an Associate of Applied Science in Business Administration degree. I obtained a Master of Business Administration degree from Georgia State University in Atlanta, Georgia in 1992.

3. My name is Alphonso J. Varner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Assistant Vice President – Interconnection Operations for BellSouth. I graduated from Florida State University in 1972 with a Bachelor of Engineering Science degree in systems design engineering. I immediately joined Southern Bell in the division of revenues organization with the responsibility for preparation of all Florida investment separations studies for division of revenues and for reviewing interstate settlements. Subsequently, I accepted an assignment in the rates and tariffs organization with responsibilities for administering selected rates and tariffs including preparation of tariff filings. In January 1994, I was appointed Senior Director of Pricing for the nine-state region. I was named Senior Director for Regulatory Policy and Planning in August 1994. In April 1997, I was named Senior Director of Regulatory for the nine-state BellSouth region. I accepted my current position in March 2001.

II. EXECUTIVE SUMMARY

4. The purpose of this Affidavit is to demonstrate that BellSouth has in place a batch hot cut process that provides additional ordering efficiencies and the same proven, seamless, quality migrations as BellSouth's individual hot cut process to convert the embedded base of Unbundled Network Element Platform ("UNE-P") arrangements to Unbundled Network Element Loop ("UNE-L") arrangements. The process is operational; the process works; and the process can be scaled to handle any foreseeable volumes.

5. While BellSouth is not relying on its Section 271 cases or its individual hot cut process in this proceeding, those findings are the foundation of the decision the Federal Communications Commission ("Commission") now has before it. Certainly the Commission's decision about the individual process and BellSouth's extensive individual hot cut performance data can and should inform the Commission's decision in this case about BellSouth's ability to effectively transfer loops from one carrier's local switch to another carrier's local switch.

6. The Commission has defined a hot cut as a process by which the Incumbent Local Exchange Carrier ("ILEC") technician "necessarily disconnects service to the customer for a brief period of time." BellSouth's batch hot cut process (which is also referred to as the "bulk migration process") is seamless because the service disruption to the customer is minimal. Moreover, because BellSouth's process allows for the migration of two (2) or more loops in a single batch order, it provides for simultaneous migration.

7. BellSouth's batch hot cut process has three (3) main components – preordering, ordering, and provisioning. First, the Competitive Local Exchange Carrier ("CLEC") submits a spreadsheet listing the lines it wishes to migrate. A BellSouth project manager will

review the spreadsheet, marshal and coordinate the necessary network forces to migrate the lines, and assign a due date to the lines.

8. Next, the CLEC will submit the lines it wants converted on a UNE-to-UNE Bulk Ordering Local Service Request ("LSR") using one of the electronic ordering interfaces BellSouth makes available to CLECs. The CLECs themselves asked for this functionality via the change control process ("CCP") and the CLECs prioritized its development. This ordering functionality allows CLECs to submit one batch LSR, with reduced information for up to 99 accounts, each of which can have up to 25 Telephone Numbers ("TNs") for a total of almost 2500 TNs per request. BellSouth's systems then generate the individual service orders for each of the loops to be migrated.

9. Next, BellSouth's network forces will provision the unbundled loops. The wiring work involved in migrating the customers is identical to the wiring work in BellSouth's individual hot cut process. The reason for this is simple – BellSouth has developed the most seamless migration process possible.

10. For the batch provisioning process, however, BellSouth added project management to gain provisioning efficiencies. The use of project management allows BellSouth to manage the batch order such that all the loops in the batch are cut in a single Central Office ("CO") in a single timeframe. This creates network efficiencies by allowing the network forces to work all those orders together. BellSouth recognizes these efficiencies by charging 10% of the nonrecurring rate for the loop when provisioned in the batch process.

11. While no CLEC to date has made extensive use of BellSouth's batch hot cut process, there are three (3) ways that this Commission can tell that BellSouth's batch hot cut

process works. First – BellSouth conducted a third party test to confirm it works. PricewaterhouseCoopers ("PwC"), the same auditor relied on by the Commission in BellSouth's Section 271 cases to establish the regionality of BellSouth's processes, watched BellSouth perform its batch hot cut process from start to finish and validated management's assertions that the process works. Second, from November 2003 to March 2004, BellSouth performed over 18,000 UNE-P to UNE-L conversions for one (1) CLEC in Florida with due date met performance exceeding 98%. This included order volumes as high as 360 lines for a single central office ("CO") for a single day. BellSouth's performance on these batch migrations, using the less efficient individual hot cut process, is strong evidence of how well BellSouth would perform using the Batch process. Third, BellSouth's individual hot cut performance continues to be exemplary month after month.

12. BellSouth's batch hot cut process is scalable. To prove BellSouth could handle the volumes, BellSouth created a so-called "worse-case scenario" by taking the highest volume it ever experienced per month for UNE-Ps growth and the highest volume it ever experienced for stand-alone unbundled loops. Then, those monthly growth rates were carried into the future to determine the "embedded base" of UNE-Ps. Then, BellSouth assumed it would get unbundled switching relief everywhere; BellSouth assumed that every UNE-P would have to be hot cut; and a 48% annual churn was assumed. Even taking all those extreme assumptions into account, BellSouth can find, hire, and train the necessary personnel to effectively cut over as many loops per day as needed.

13. Finally, BellSouth enhanced its process to resolve CLEC criticisms raised in the context of the state Triennial Review Order ("TRO") cases. In short, the CLECs asked for 12

enhancements of which nine (9) have already been made and the other three (3) are in progress towards completion.

14. With these enhancements, which are not required by the TRO but which BellSouth agreed to make, there can be no meaningful debate about the sufficiency of BellSouth's process. Simply...BellSouth addressed the CLECs' concerns and made them non-issues.

15. As will be discussed in this affidavit, it should become evident to this Commission that BellSouth's third party test, actual data, and real facts conclusively reflect that BellSouth has a timely and effective process in effect to transfer batches of loops from one carrier's local switch to another carrier's local switch.

III. BELLSOUTH'S BATCH HOT CUT PROCESS

16. BellSouth provides three (3) different hot cut processes. Despite this variety of service offerings, however, the actual hot cut remains a simple, straightforward task – and a task BellSouth can perform at high volumes with a high degree of accuracy and speed. BellSouth offers CLECs the following types of hot cuts: (1) individual hot cuts; (2) project hot cuts; and (3) batch hot cuts.

17. An individual hot cut service request is for a particular end-user account and is available for both residence and business service lines. Service requests for individual accounts may include single or multiple lines since a given customer may have several lines in its account. Simply put, the individual account service request will process a single order for a single end-user. Exhibit BLS-1 depicts a flow-chart of the work steps involved in BellSouth's individual hot cut process. BellSouth's individual process was approved by this Commission in BellSouth's Section 271 applications. BellSouth's process provides

for the following:

- Pre-wiring and pre-testing of all wiring prior to the due date
- Verification of dial tone from the CLEC's switch
- Verification of correct telephone number from the BellSouth switch and CLEC switch using a capability referred to as Automatic Number Announcement ("ANAC")
- Monitoring of the line prior to actual wire transfer to ensure end-user "call in progress" service is not interrupted
- Notification to the CLEC that the transfer has completed

18. The project hot cut is for cuts involving 15 or more lines to a single end-user. To ensure an efficient cut, BellSouth involves a Customer Care Project Manager ("CCPM") to coordinate the different work functions. The criteria for project hot cuts can be found at http://www.interconnection.bellsouth.com/guides/html/other_guides.html.

19. The batch hot cut service request (which is interchangeably referred to as the "bulk migration" process) provides efficient processing for large volume migrations of UNE-P service to UNE-L service and is particularly suited to the migration of an embedded base of UNE-P circuits to UNE-L circuits. The batch hot cut process applies to migrations of multiple accounts for the same service type within a specific wire center. The batch process combines ordering efficiencies and project management support with a proven hot cut provisioning process. Attached is BellSouth's *Unbundled Network Element Platform (UNE-P) and DS0 Wholesale Local Platform Service to UNE-Loop (UNE-L) Bulk Migration* CLEC Information Package as Exhibit BLS-2. It can also be found at

http://www.interconnection.bellsouth.com/guides/unedocs/BulkManpkg.pdf . It is the batch process on which we will focus for the remainder of our affidavit.

20. BellSouth's "UNE-P to UNE-L Bulk Migration" is a batch hot cut process that CLECs may use when migrating existing multiple non-complex UNE-P services to a UNE-L offering, the conversions about which the Commission expressed concern in the TRO. Triennial Review Order, at ¶ 489. The batch hot cut process offers electronic ordering capability and adds project-management services to the basic proven hot cut provisioning process.

21. BellSouth's batch hot cut process includes DS0 Enhanced Extended Links ("EELs"), loops served via Integrated Digital Loop Carrier ("IDLC")[1], and CLEC-to-CLEC migrations that meet the other criteria for batch hot cuts. BellSouth's CLEC-to-CLEC conversion product is described in the *CLEC to CLEC Conversion for Unbundled Loops* document located on the CLEC Guides web site at: http://www.interconnection.bellsouth.com/guides/html/usoc.html.

22. BellSouth also includes, at the CLEC's request, after-hours and Saturday cuts in the batch process. As with all special projects, this work could be subject to overtime billing as specified in the parties' interconnection agreement.

Pre-ordering

23. The batch process starts with pre-ordering. In the pre-ordering phase, the CLEC currently submits a Notification Form to BellSouth's CCPM for UNE-P accounts to be converted to UNE-L within a single wire center. The CCPM reviews the Notification

[1] For additional information on IDLC, see the affidavit of W. Keith Milner, filed concurrently herewith.

Form for errors and assigns a Bulk Order Project Identifier ("BOPI") and forwards the Notification Form to the Network Single Point of Contact ("SPOC") who assigns due dates to accounts and returns the Notification Form to the CCPM, who then returns the Notification Form to the requesting CLEC.

24. Additionally, BellSouth also is currently developing a web-based scheduling tool that will allow the CLECs to schedule the due dates for their orders on their own prior to submitting their bulk requests. This will remove the involvement of the CCPM and the Notification Form from the pre-ordering part of the batch migration process. This application currently is targeted to be made available to the CLECs effective October 29, 2004. Exhibit BLS-3 provides some specific details of this web-based application.

25. During the current pre-ordering process, there are specific intervals for the return of the Notification Form to the CLEC. Those intervals are as follows:

- Up to 99 Telephone Numbers, 4 business days
- 100 – 199 Telephone Numbers, 6 business days
- 200 or more Telephone Numbers, the CCPM will negotiate with SPOC
- Multiple Batch Requests from multiple CLECs may be submitted simultaneously
- Maximum Telephone Numbers per Batch Request is 2,475 (that is, 99 Accounts, each of which may have 25 Telephone Numbers).

26. Currently, the first hot cut due date to be assigned by the SPOC will be a minimum of 15 business days after the CLEC submits the Notification Form to the CCPM. This is because the overall interval includes four (4) business days for the CCPM response and three (3) business days for the CLEC to review the Notification and to submit an error-

free bulk LSR. The overall interval also includes an eight (8) business day provisioning period between when the CLEC submits its LSR and the first hot cut due date .

27. With the implementation of the web-based scheduling tool, the overall interval will be reduced to eight (8) business days for provisioning.

Ordering

28. The ordering mechanism for the batch migration process is the UNE-P to UNE-L batch migration request. The purpose of this ordering mechanism is to allow CLECs to electronically submit multiple UNE-P to UNE-L conversion requests in a streamlined and efficient manner. In other words, the UNE-P to-UNE-L batch migration ordering process allows a CLEC to migrate multiple UNE-P end-users to UNE-L service without the CLECs having to submit multiple individual LSRs.

29. With this electronic process, each UNE-P to UNE-L batch migration request may contain a maximum of 99 accounts, each identified by a Purchase Order Number ("PON") and an Earning Account Telephone Number ("EATN"). However, a CLEC can include a maximum of 25 end-user TNs per EATN. Thus, a CLEC could migrate as many as 2,475 end users (99 EATN X 25 TN) per batch migration.

30. BellSouth implemented its fully-mechanized, electronic UNE-P to UNE-L batch migration ordering process on March 29, 2003, as a result of change request CR0215 originally submitted by AT&T. Every CLEC had the opportunity to participate in the development of this electronic ordering process via the change control process and AT&T, in particular, was actively involved.

31. BellSouth provides extensive information for CLECs that are interested in learning about and implementing the electronic ordering of UNE-P to UNE-L batch migrations. The

business rules for ordering UNE-P to UNE-L batch migrations are contained in the *Local Ordering Handbook* ("LOH"), which is available at BellSouth's web site.[2] BellSouth has also provided CLECs with the *Unbundled Network Element Platform (UNE-P) and DS0 Wholesale Local Platform Service to UNE-Loop (UNE-L) Bulk Migration* CLEC Information Package. This document is available at BellSouth's web site.[3] The CLEC information package is intended to provide CLECs with general ordering information specific to the UNE-P to UNE-L batch migration process. In addition, the Local Exchange Navigation System Guide ("LENS Guide") contains ordering instructions for those CLECs that use the LENS ordering interface. The LENS Guide is posted on BellSouth's web site.[4]

32. The UNE-P to UNE-L batch migration ordering process operates as follows:

- After its receipt of the updated Bulk Notification form, the CLEC has three (3) business days to submit an error-free Mechanized Bulk LSR containing the accounts and due dates to BellSouth's LCSC. BellSouth's mechanized systems will create individual service orders for each of the accounts.
- The BellSouth Customer Wholesale Interconnection Services ("CWINS") Center will advise the CCPM of any service orders that will not be completed on the due date.
- The CCPM will advise the CLEC on current order status.

33. In batch ordering, the CLEC must submit a batch migration request containing the accounts and due dates. CLECs can use either the Electronic Data Interchange ("EDI"),

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[2] http://www.interconnection.bellsouth.com/guides/html/leo.html
[3] http://www.interconnection.bellsouth.com/guides/html/unes.html
[4] http://www.interconnection.bellsouth.com/guides/html/lens_tafi.html

Telecommunications Access Gateway ("TAG"), or Local Exchange Navigation System ("LENS") ordering interfaces to place a batch migration request. The CLEC first completes information for the entire batch migration package. The LOH refers to this as the "global level."[5] This information includes the BOPI and information about the wire center within which the bulk migration will be performed. The CLEC also completes information about the CLEC initiator and the implementation contact person. If the migration involves designed loops, the CLEC must include contact information, including an address, for the design contact person.[6] The CLEC only enters this global level information once for the entire package.

34. Next, the CLEC completes the information needed for each account of the two to 99 accounts that will be migrated. The LOH refers to this as "account level" and "line level" activity. When writing the user requirements, BellSouth developed this functionality so that the CLECs would only fill out a minimum number of fields. Some of the fields that the CLECs are required to complete include the PON, the end user's name, the billing account number ("BAN1"), the EATN, and the line number ("LNUM"). The complete list of fields is described in the LOH.[7]

35. CLECs do not include an address for each account. Only if the migration involves designed loops must the CLEC include address information for the design contact person, and only at the "global level" of the batch migration request. BellSouth has simplified the number of fields that the CLECs must complete at the "account level" and "line

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[5] The LENS Guide refers to this level as the "Package Level."

[6] Designed loops require BellSouth to perform design engineering activities.

[7] The LENS Guide also contains similar information for users of the LENS interfaces. The "account level" and "line level" fields are referred to as the "PON level" in the LENS Guide.

level" for each end user on the batch migration request. BellSouth reduced the required information to the minimal amount necessary for conversions from UNE-P to UNE-L.

36. After BellSouth's systems receive the batch migration request, the first level edits are applied in order to check the request for errors. If there are no first level errors in the batch migration request, BellSouth's systems will accept the batch migration request and break the accounts into individual service orders. BellSouth's systems first generate the individual LSRs, using the information provided by the CLEC at the account and line levels of the batch migration. For example, the systems take the telephone number that the CLEC provided for an individual PON and retrieve an address from the address database (the Regional Street Address Guide or "RSAG"). The individual LSRs are checked against the second and third level edits to determine if the data on the LSR is correct. Accurate and complete LSRs flow-through BellSouth's Operations Support Systems ("OSS") to the service order generator (Service Order Communications System or "SOCS"), which generates a service order for each LSR. BellSouth then sends a Firm Order Confirmation ("FOC") to the CLEC for each LSR. The service orders then move downstream for provisioning, including updating E911 databases and directory listing information, just as they would for service orders created from LSRs submitted individually.

37. After BellSouth's systems have created the individual LSRs from the batch migration request and information in BellSouth's systems, BellSouth will clarify any mistakes that are found in the individual LSRs on an individual basis. Thus, if one LSR out of 99 has an error, the 98 error-free LSRs will continue to process. BellSouth finds these errors when its systems apply the second and third level edits. Level 2 data edits verify that the

fields in the LSR contain the correct information, such as whether the telephone number supplied by the CLEC is known by BellSouth's systems. Third level edits continue the evaluation of the data in the fields of the LSR, such as comparing a given Universal Service Order Code ("USOC") and any associated Field Identifiers ("FIDs") in a service order to ensure that the FIDs are allowed and in the proper order. Therefore, if any data errors are found in any of the LSRs, BellSouth then clarifies the LSR individually with the CLEC, just as it would with any LSR submitted individually.

38. BellSouth offers two (2) coordination levels in the batch hot cut process – coordinated and non-coordinated. These two (2) options are discussed in the following paragraphs.

39. ***COORDINATED*** hot cuts require BellSouth to convert the CLEC's customer account on a date specified by the CLEC and a best effort time frame negotiated by the parties. For coordinated hot cuts, BellSouth contacts the requesting CLEC 24 to 48 hours prior to the due date to verify that BellSouth's service order information agrees with the CLEC's request. At that time, BellSouth also confirms no jeopardy situation exists (either for the CLEC or for BellSouth) and provides to the CLEC the status of any dial tone test performed (that is, BellSouth's test of dial tone from the CLEC's switch). Finally, during this call, the parties verify the targeted time frame on the due date that the hot cut will be performed.

40. On the due date, CWINS will contact the CLEC prior to the conversion time for a final validation that the migration is still a "go". The BellSouth CWINS technician communicates with BellSouth's Network group prior to the conversion being started. Once all BellSouth personnel are in communication, the CWINS technician will make the execution request to perform the hot cut and stays on the call, awaiting Network

completion notification. When the Network technician completes the hot cut, that technician notifies the CWINS technician who documents the completion. At this point, the hot cut is complete within BellSouth's network. The CWINS technician then attempts to notify the CLEC for acceptance. Acceptance in this sense means that the CLEC agrees that the order has been fulfilled successfully and that is appropriate that BellSouth close the order as complete. Once CLEC acceptance is confirmed or default acceptance occurs, the pending service orders are completed by the CWINS technician.

41. BellSouth will provide the CLEC a window of time within which batch hot cuts will be completed. BellSouth guarantees a four (4) hour time window for coordinated cuts in the batch process.

42. ***NON-COORDINATED*** hot cut requests are converted by BellSouth's Network personnel at various times on the due date based on the Network technicians' work load activity and schedule. Once BellSouth Network personnel complete the non-coordinated hot cut, the technician completes the work order that, in turn, is populated on a web-based notification tool for batch hot cuts. Exhibit BLS-4 provides specific details and sample screen prints of the information contained in this web-based application.

43. BellSouth's batch process includes a reversal process to reverse the hot cut if something goes wrong. Some have referred to this as a "throw back" process in that the customer's service is "thrown back" to the BellSouth switch. In the rare event that there is a problem encountered during a hot cut, BellSouth will work to resolve the problem if it is in the BellSouth portion of the network. If the problem is in the CLEC portion of the network, the CLEC has an opportunity to either correct its problem or request that BellSouth delay the hot cut as long as the CLEC has not performed number porting activity and the

BellSouth service orders have not been completed. If the conversion orders have already been completed, the CLEC may input a trouble ticket on the unbundled loop. If the trouble is reported within 24 hours of the completed date, an expedite procedure is in place to throwback to the original UNE-P service at the CLEC's request.

IV. EFFECTIVENESS OF THE BATCH HOT CUT PROCESS

44. BellSouth's Bulk Migration Process is both seamless and effective. To corroborate this fact, BellSouth engaged PriceWaterhouseCoopers ("PwC") to provide an attestation on the effectiveness of BellSouth's batch process. PwC's work was twofold: first, PwC observed a test of the Bulk Migration Process using a pseudo CLEC; second, PwC observed a number of live UNE-L migrations (that is, hot cuts) in several different states in BellSouth's region. The test results reflect that BellSouth provides a proven, seamless, high quality individual hot cut process to handle the UNE-L volumes that would likely result if BellSouth were to obtain full relief from unbundled circuit switching; and that BellSouth provides a batch hot cut process that offers additional ordering and provisioning efficiencies to enhance the same proven, seamless, quality migrations that are currently associated with individual hot cuts. This process will sufficiently support the batch conversion of a CLEC's embedded UNE-P customer base to UNE-L services.

45. BellSouth introduced its electronic batch migration process to the CLEC community in March 2003. Despite their expressed interest in having such a process, not a single CLEC took advantage of it in the months following its introduction. Therefore, BellSouth had no significant commercial data with which to demonstrate the efficiency and viability of the bulk migration process other than the extensive performance data

demonstrating the effectiveness of its individual hot cut process. For this reason, BellSouth engaged PwC to perform its independent third party test. BellSouth selected PwC because of the Commission's familiarity with PwC's work resulting from the regionality testing PwC conducted as part of BellSouth's Section 271-approval process. The Commission relied upon PwC's objective and professional findings as part of its Section 271 decision.

46. After discussions with PwC about the testing concept, BellSouth engaged the firm to conduct an attestation examination whereby PwC would examine two (2) BellSouth assertions concerning its Bulk Migration Process. PwC conducted the examination in accordance with "attestation standards" established by the American Institute of Certified Public Accountants ("AICPA"). An "attestation engagement" occurs when a practitioner, such as PwC, is engaged to issue a written statement as to whether or not the written assertion of another party, such as BellSouth, is reliable. Under the AICPA attestation standards, a statement resulting from such an examination is the highest level of assurance that can be provided on an assertion and, if positive, results in an opinion by the practitioner, PwC, that the original assertions have been found to be fairly and accurately stated in all material respects. To put this in more simple terms applicable to this test, BellSouth made two claims (assertions) and PwC validated the claims with the opinion that they express in their report (Report of Independent Accountants).

47. BellSouth's assertions as well as the PwC opinions can be found in Exhibit BLS-5, BellSouth Telecommunications Inc.'s Report on the BellSouth Bulk Migration and Regional Tests, December 22, 2003. This attachment contains a collection of reports as well as a description of the Bulk Migration Test. The outline of the report package can be

found on the Table of Contents page. The outline of the report is as follows:

I. **Report of Independent Accountants for BellSouth Telecommunication's Bulk Migration Process**—this report was issued by PwC after they observed the bulk migration test associated with BellSouth's first assertion. They concluded and opined that the Bulk Migration Process would enable a CLEC to bulk migrate its customer base from UNE-P to UNE-L. PwC found a few deviations which can be seen on the following page of the report titled Attachment A and which will be discussed later.

II. **Management Assertions on BellSouth Telecommunication's Bulk Migration Process**—this report is BellSouth's first assertion. PwC validated this assertion with their Report of Independent Accountants in section I. The same list of deviations is provided in Attachment B of the report to the BellSouth Assertion on Bulk Migrations.

III. **Report of Independent Accountants for BellSouth Telecommunication's Hot Cut Process**—PwC issued this report after the firm observed hot cuts across the BellSouth region for the second BellSouth assertion. They concluded and opined that the hot cut provisioning process is the same when using the Bulk Migration Process or when using the single order migration process across the BellSouth region. PwC found a few deviations and which can be seen in Attachment C of the report and which will be discussed later.

IV. Management Assertions on BellSouth Telecommunication's Hot Cut Process—this report is BellSouth's second assertion. PwC validated this assertion with their Report of Independent Accountants in section III. The same list of deviations is provided in Attachment D of the report to the BellSouth Assertion on the Regional Test.

48. BellSouth made two (2) assertions. First, BellSouth asserted that its Bulk Migration Process enables a CLEC to migrate multiple end-users from UNE-P service to UNE-L service. In order to facilitate the test, BellSouth created a pseudo-CLEC. Use of the pseudo-CLEC is an established methodology that has been utilized in other process tests. The pseudo-CLEC was established and operated similar to the methodology engaged during the Section 271 Third Party Tests that were conducted in Florida and Georgia. The pseudo-CLEC submitted multiple bulk order requests following the written procedures provided to the CLECs on BellSouth's website. Details about BellSouth's batch hot cut process can be found on-line at: http://www.interconnection.bellsouth.com/guides/unedocs/BulkManpkg.pdf.

49. The PwC examination of the Bulk Migration Process included a review of all the process steps. They began with a review of the project notification that would be submitted by the CLEC, and then reviewed the associated activities of the BellSouth Project Manager. Once all the preordering type of activities were completed, PwC reviewed the activities associated with the ordering process. They observed the pseudo CLEC submissions and the activities associated with BellSouth's ordering systems and the Local Carrier Service Center ("LCSC"). Next, PwC reviewed the traditional provisioning processes including those of BellSouth's CWINS as well as BellSouth's central office technicians and field

technicians. The review of these processes for BellSouth's first assertion was very comprehensive as evidenced by the quantity of time and number of individuals utilized by PwC in testing.

50. Second, BellSouth asserted that the Bulk Migration Process requires central office and field technicians to physically perform the Hot Cut Process. This Hot Cut Process is the very same process used for non-bulk hot cuts (that is, individual hot cuts) in BellSouth's nine state-region. In spite of the multiple hot cut offerings, the act of performing a hot cut remains a simple, straightforward task – and one that BellSouth performs at high volumes with a high degree of accuracy and speed. Therefore, BellSouth made the assertion that the Hot Cut Process is used for both bulk hot cuts as well as individual hot cuts across the region served by BellSouth. PwC validated the process used across BellSouth's region by observing central office and field forces using the same hot cut process described in BellSouth's second assertion in Exhibit BLS-5.

51. PwC expresses their threshold for deviation reporting in the affidavit of Mr. Paul M. Gaynor of PwC, which can be seen in Exhibit BLS-6. The affidavit was prepared to provide additional detail for the types of testing procedures used by PwC during the attestation examinations. It also provides criteria for the threshold testing beginning with paragraph 10 on page 6 of Exhibit BLS-6. Their threshold or criteria transcends into three categories:

- Adherence to each process step in excess of 95% of the time.
- Any impact to customer service that exceeded 15 minutes.
- Any observation that actually met the first two criteria, but PwC determined that the action (that is, a particular process step) was critical, thus it should be reported

anyway. These categories of criteria will be further explored as each deviation is described and addressed.

52. BellSouth created the pseudo-CLEC by establishing approximately 750 UNE-P accounts in three (3) wire centers in Florida for the test. Florida was chosen as the test location because it has the highest number of embedded UNE-P customers and it was expected to be the first state to experience extensive CLEC utilization of the Bulk Migration Process. BellSouth designed the test bed to mirror actual facility distribution and the makeup of existing UNE-P accounts. BellSouth wanted to ensure that the outside plant facilities assigned to the test bed circuits would mirror the actual distribution of facilities within the state. An evaluation of Florida's existing facility usage revealed that approximately 50% of circuits were served by copper facilities, 14% were served by Universal Digital Loop Carrier ("UDLC") and 36% were served by Integrated Digital Loop Carrier ("IDLC"). BellSouth wanted its test bed to reflect the actual make-up of existing UNE-P accounts in terms of service type or class of service. BellSouth obtained and analyzed the data associated with establishment of UNE-P service for actual customers. The data indicated that the test bed should consist of 85% residential accounts, 10% business, 3% coin, and 2% remote call forwarding ("RCF"). The latter class of service was further broken down into residential and business RCF products. These classes of service are consistent with the UNE-P requirements listed on page 13 of the Bulk Migration Process CLEC Information Package that can be found on-line at: http://www.interconnection.bellsouth.com/guides/unedocs/BulkManpkg.pdf.

53. Next, BellSouth simulated a CLEC switch by wiring from the originating equipment ("OE") block on the BellSouth frame in each central office to the CLEC's Connecting

Facility Assignment ("CFA") block to establish dial tone for the pseudo- CLEC switch. The switch ports from BellSouth's switch appear on the OE block, thus dialtone from BellSouth's switch was used to simulate dialtone from a CLEC's switch. This methodology was employed for accounts containing telephone numbers served by copper and UDLC facilities. IDLC facilities do not have a physical appearance on the BellSouth frame so a second set of telephone numbers was established and wired as described above. This second set of telephone numbers was mapped to the telephone numbers served by IDLC to enable all normal conversion activities to occur. This approach also allowed for the conversion from IDLC facilities to copper or UDLC facilities during the test.

54. There was one step in the provisioning process that BellSouth was not able to complete. Because the CLEC switch was simulated, BellSouth could not send any messages to the Network Portability Administration Center ("NPAC") which cause the number port to occur. In other words, BellSouth could not actually move the UNE-P telephone number from the BellSouth switch to the CLEC switch because in the simulated environment, there was no CLEC switch. The absence of this step did not materially impact the testing of BellSouth's bulk migration process since the CLEC itself initiates and largely controls the number porting routing change associated with moving the customer from BellSouth's switch to its own. All other BellSouth and CLEC ordering and provisioning procedural steps were followed, completed, and observed by PwC during the course of the test.

55. In order to determine what types of bulk migration hot cuts BellSouth performed to confirm the first assertion of the test, BellSouth reviewed its existing base of UNE-L

accounts to determine the actual class of service make-up. The analysis indicated that approximately 87% of actual UNE-L migrations were for Service Level One ("SL1") voice grade loops while 7% of the UNE-L migrations were for Service Level Two ("SL2") voice grade loops. The remaining 6% were distributed across the other designed and non-designed UNE-L classes of service. This data, combined with the list of classes of service to which UNE-Ps may migrate, guided BellSouth in issuing migration orders that were distributed based on the embedded base yet covered all "migration-permissible" loop types. A list of loop types to which UNE-Ps may be migrated is found on page 13 of the Bulk Migration Process CLEC Information Package. The test included both central office and field cuts. Since 85% of the embedded base of UNE-P accounts consists of residential classes of service, most of the hot cuts were ordered as non-coordinated. The test was structured and conducted as follows:

- Day 1 of Testing on December 2, 2003—West Hollywood Central Office (total of 125 Hot Cuts). The first day of testing was based upon four (4) Bulk Migration Project Notifications or BOPIs. These four (4) BOPIs accounted for 124 migrations using the bulk migration process and an additional migration was conducted via the submission of a single LSR. The end result was that there were a total of 125 hot cuts on the first day of testing.
- Day 2 of Testing on December 4, 2003—Arch Creek Central Office (total of 125 Hot Cuts). The second day of testing was based upon six (6) BOPIs. These six (6) BOPIs accounted for 119 bulk migrations, and six (6) single migrations were included to reach the test target of 125 hot cuts.
- Day 3 of Testing on December 5, 2003—Perrine Central Office (total of 125 Hot

Cuts). The third day of testing was based upon three (3) BOPIs. These three (3) BOPIs accounted for 108 bulk migrations and 17 single migrations were included to reach the test target of 125 hot cuts.

- Day 4 of Testing on December 11, 2003—West Hollywood, Arch Creek and Perrine Central Offices (total of 383 Hot Cuts). The fourth day of testing was based upon a total of five (5) BOPIs for West Hollywood, three (3) BOPIs for Arch Creek, and seven (7) BOPIs for Perrine. The five (5) BOPIs in West Hollywood accounted for a 125 bulk migrations. Additionally, there were two (2) single migrations in West Hollywood for a total of 127 hot cuts. The three (3) BOPIs in Arch Creek accounted for 126 bulk migrations, and there were also five (5) single migrations in Arch Creek for a total of 131 hot cuts. The seven (7) BOPIs in Perrine accounted for 122 bulk migrations and three (3) additional single migrations, which resulted in a total of 125 hot cuts.

56. The target number of bulk migrations for each of the first three (3) test dates was 125, while the fourth date was designed to test simultaneous provisioning in all three (3) central offices. The end result was that BellSouth completed a total of over 375 migrations on the fourth date. Therefore, over 750 hot cut migrations occurred across the four (4) days of testing with 724 of those resulting from bulk migration service requests.

57. PwC validated Bellsouth's first assertion by observing Bulk Migration hot cuts. The details of PwC's findings can be found in their Report of Independent Accountants in Exhibit BLS-5. In summary, PwC observed a total of 724 bulk hot cuts during the four (4) days of bulk migration testing. In PwC's Report of Independent Accounts for the first assertion, they provided a positive confirmation of BellSouth's first assertion with the

qualification of some deviations. It is important to keep the deviations and their impact in an appropriate context. PwC observed 724 bulk hot cuts during the four (4) test days. Attached is Exhibit BLS-7 which provides an explanation of the deviations found in testing BellSouth's first assertion and its impact to the customer:

58. To summarize the overall results for the first assertion, out of the eight (8) deviations there were two (2) deviations listed as category 1 where adherence to the process did not occur at least 95% of the time. In this instance, Deviation 7 involved an issue not considered material since no CLEC had actually bulk ordered the associated products (i.e., Unbundled Copper Loop Non-Designed ("UCL-ND") and Remote Call Forwarding ("RCF")) which constitute less than 2% of the service types in BellSouth's embedded base services. In category 2, there were three (3) deviations where customer service was impacted for over 15 minutes. Category 3 had three (3) deviations where the issue would not be considered reportable via the first two (2) threshold categories, but PwC elected to report the issue as a deviation to ensure that it was visible to the reader.

59. Responding to Deviation 7 (that is, the issue with UCL-ND) BellSouth resolved the underlying problem. RCF is currently not offered as a product in the Bulk Migration Process. Thus, that Deviation has been completely resolved.

60. After considering the materiality of the deviations noted by PwC in their report, it is clear that BellSouth's first assertion was validated. PwC ultimately found that its test validated the sufficiency of BellSouth's Bulk Migration Process and the results provide quantifiable proof that BellSouth's process is effective in allowing CLECs to migrate large numbers of their customers from UNE-P to a variety of UNE-L services.

61. To further support this finding, BellSouth would note that its hot cut process was also

tested by KPMG (now known as BearingPoint) most recently during the Florida Third Party Test as part of BellSouth's Section 271 application. KPMG first conducted a detailed review of BellSouth's methods and procedures documents that governed hot cuts. Next, as did PwC, KPMG physically observed BellSouth technicians as they performed actual hot cuts. Their finding was the same as PwC's; namely, that BellSouth's technicians provisioned the hot cuts in accordance with documented methods and procedures. KPMG took their analysis a step further by also assessing BellSouth's performance from a Service Quality Measurement ("SQM") perspective. There were test points or evaluation criteria used to determine how well BellSouth met the SQM objectives for hot cut completions. KPMG gave a satisfactory rating to each of the evaluation criteria, a clear endorsement of BellSouth's documented hot cut process and its ability to successfully follow it. In addition to the findings of PwC and KPMG, both the Florida Public Service Commission ("FPSC") and this Commission likewise confirmed the effectiveness of BellSouth's individual hot cut process during BellSouth's Section 271 Application approval process. Finally, the FPSC, along with eight (8) other state commissions and this Commission, have each independently found that BellSouth's individual hot cut process is nondiscriminatory, timely, accurate, and effective.

62. BellSouth made its second assertion to provide proof that the Bulk Migration process applies ubiquitously across the BellSouth region. PwC's confirmation of the second assertion provides proof that the provisioning portion of BellSouth's hot cut processes is the same region-wide. In order to verify the validity of the second assertion, PwC observed live hot cuts across BellSouth's region. PwC employed sampling techniques as described beginning in paragraph 34 of Exhibit BLS-6 to determine the sample size of

observations needed for the BellSouth region. PwC was able to observe sufficient order volume in seven of the nine states in BellSouth's region. PwC was unable to obtain sufficient volume in Alabama or Kentucky, although that does not alter the fact that the same hot cut process is utilized across all nine states. Beginning in paragraph 39 of Exhibit BLS-6, PwC described the processes that they observed. They concluded that these same processes were in use across all the states in the BellSouth region. Based upon these observations, PwC's testing leads to the conclusion that the same hot cut process applies in each of BellSouth's states. Thus, the Bulk Migration Process and its proven success in enabling a CLEC to migrate customers in a bulk fashion are applicable to all the states within the BellSouth region.

63. Similar to the first assertion, PwC did identify and list for the second assertion a few items that it titled deviations. Again, it is important to look at the total context of their live hot cut testing to put their observations in perspective. PwC observed 96 live hot cut service orders for a total of 179 migrations to test BellSouth's regionality assertion. Out of 179 hot cuts, it is important to note that all 179 hot cuts were successfully completed.

64. In Attachment C to their Report of Independent Accountants for the second assertion which is contained in Exhibit BLS-5, PwC listed the deviations that they observed. The first six (6) deviations are the same deviations cited for the first assertion. Exhibit BLS-8 provides an explanation of the deviations directly associated with the second assertion and its impact to the customer:

65. At the end of this testing period 100% of the hot cuts were successfully completed which can be attributed to the numerous checks that BellSouth has intentionally built into the hot cut process. Because of the existence of multiple crosschecks, the omission of one

step, as observed by PwC, does not typically derail the actual conversion. Similarly, in these instances, there was no material impact to the CLEC customer. Again, based upon the Bulk Migration Test as well as live hot cut observations, PwC confirmed that BellSouth uses the same hot cut process for individual and bulk hot cuts. They further confirmed that this same process is used ubiquitously across the BellSouth region.

66. Through the testing conducted by PwC, BellSouth has demonstrated that its Bulk Migration Process of UNE-P service to UNE-L service is both seamless and effective. PwC observed some 724 hot cuts utilizing the Bulk Migration Process and some 179 live hot cuts in several states. The test proves that BellSouth provides a proven, seamless, high quality batch hot cut process to handle the UNE-L volumes that would likely result if BellSouth were to obtain full relief from unbundled circuit switching. This process will sufficiently support the batch conversion of a CLEC's embedded UNE-P customer base to UNE-L services.

67. In addition to the Third Party Test, the commercial usage of BellSouth's individual hot cut process remains exemplary. During the period November 2003 through March 2004, BellSouth successfully migrated over 18,000 UNE-P arrangements to UNE-L arrangements for a single CLEC in Florida. While the CLEC did not choose to use the batch process, the fact that BellSouth could migrate that many loops using its less efficient individual process demonstrates the high degree of accuracy and skill in BellSouth's processes and network operations staff.

68. The highest single day/single office volume of hot cuts that BellSouth has performed for one CLEC occurred on March 1, 2004, when BellSouth performed over 360 hot cuts in one (1) central office.

69. BellSouth's individual hot cut performance is further evidence of BellSouth's ability to convert loops from one carrier's switch to another carrier's switch. Performance data generated by measurements approved by state commissions demonstrates that BellSouth's hot cut process does not present an operational barrier to UNE-L market entry. For the period of December 2002 through July 2004, BellSouth successfully handled 99.7% (54,586 / 54,743) of all coordinated conversions within BellSouth's nine-state area. The overall average interval for each cutover during this period was 2:52 minutes: seconds. A detailed view of BellSouth region-wide data, and the performance results, is provided in Exhibit BLS-9.

70. The data provided in this filing are produced by the Performance Measurement Analysis Platform ("PMAP"), which is the same system utilizing the same service quality measurements ("SQM") that produce these data for the state commissions, the Commission, and the CLECs each month. The performance results are produced by the same process that yielded data relied upon by the state commissions and the Commission to conclude that BellSouth met its Section 271 obligations.

V. SCALABILITY OF BELLSOUTH'S BATCH HOT CUT PROCESS

71. BellSouth's batch hot cut process is scalable in both network services and in its centers.

72. BellSouth's Network department personnel ran force models to forecast the additional hot cut load necessary in its centers and in network operations that will be required if unbundled switching relief is granted. Some examples of the inputs that go into the network force model are as follows:

- Forecast of inward movement and lines in service for various products including

1FR, 1FB, UNE-P, ADSL, DS1, DS3, etc.

- Assumptions for trouble report rates and dispatch rates
- Productivity levels
- Productive versus non-productive hours
- Capital expenditures
- Supervisory span of control

73. BellSouth made various assumptions about the volume of UNE-L (and thus, hot cut volumes) in its forecast. In each instance, however, BellSouth took the highest expected volumes to generate a "worst-case" view of UNE-L volume. BellSouth can scale its network forces to meet that "worst-case" scenario.

74. In this context, "worst case scenario" mean the absolute maximum amount of hot cuts that BellSouth's forces would have to handle if the following were to occur:

- This Commission finds that CLECs are not impaired without unbundled switching (and thus, UNE-Ps) in any market in BellSouth's nine-state region.
- CLECs decide to convert the totality of their UNE-P base to unbundled loops attached to the CLECs' switches rather than BellSouth's switches.
- UNE-P growth and UNE-L growth is maintained throughout the relevant period for the absolute highest volumes of each that has occurred at any time in BellSouth's region.

75. Other adjustments to anticipated volumes were the result of CLEC workshops where CLECs suggested that two (2) adjustments should be made. While BellSouth does not necessarily agree with such a suggestion, those adjustments were incorporated to prove the point that BellSouth can enlarge its work centers and personnel to handle even worst-

case volumes with these additional factors considered. The two (2) adjustments suggested are to increase the volumes to include some level of "churn" from one carrier to another and to increase the volumes to include some level of increased trouble report rate for unbundled loops compared to UNE-P arrangements. Accordingly, an upward adjustment of 4% churn per month (48%) per year and an upward adjustment of 5% increased trouble report rate were made. These adjustments were treated as if they resulted in additional hot cuts (again, a worst-case assumption) and the resultant monthly volume (at the regional level) for hot cuts rose to 347,254 per month (15,572 per business day).

76. BellSouth also factored in the dispatches required as a result of IDLC being used to provide service to some end users. The model reflects the percentage of IDLC in each central office and increments the dispatch volume accordingly. This is because employees in BellSouth's installation and maintenance operations must be dispatched to perform hot cuts when IDLC is involved. These employees will be involved in hot cuts when BellSouth has to change the outside plant facility, such as converting a loop from IDLC to non-integrated DLC or to a copper pair.

77. Once the load projections were obtained, they were multiplied by the amount of time required in the central office and in the field to complete the wiring and perform the hot cuts. BellSouth calculated the time projections based on wiring and cutting one line per order. This method yielded the largest number of employees required. BellSouth anticipates that when the conversions do occur, there will be efficiencies gained when multiple hot cuts can be performed at the same location. Here again, this assumption of one hot cut per order was made to ensure the so-called "worst case scenario" could be

successfully handled.

78. At the time BellSouth determined its "worst case scenario", there were about 2.21 million UNE-Ps in service across BellSouth's nine-state region (October 2003). The highest single-month volume of UNE-Ps added (116,295) occurred in June 2002. The highest single-month volume of UNE-Ls inward movement (19,029) occurred in January 2001. The pictorial in Exhibit BLS-10 depicts how those volumes grow over time.

79. Using October 2003 as the starting point and projecting forward for nine (9) months to July 2004 (the earliest date a decision was expected from a Public Service Commission in BellSouth's region), there would be 3.26 million UNE-Ps in service (2.21M + (9 * 116,295). During that period, since UNE-Ps in service would continue to grow and because the conversion of a BellSouth retail account to a UNE-P arrangement does not require a hot cut, the monthly hot cut volume expected in July 2004 was assumed to be equal to the quantity of "stand-alone" unbundled loops requested (19,029).

80. For its "worst case scenario", BellSouth assumed that in July 2004, BellSouth would be relieved of all UNE-P obligations but that CLECs could continue to request UNE-Ps for an additional five (5) months. Thus, the expected quantity of UNE-P-s in service in December 2004 would be 3.84 million. This level of UNE-Ps becomes the "embedded base" which later will be converted to stand-alone unbundled loops via the hot cut process. For the next eight (8) months, the monthly volume of hot cuts would rise to 135,324. This is the sum of the worst case unbundled loop volume (19,029) plus the worst case monthly growth for UNE-Ps (116,295) that now would be provided as unbundled loops rather than as UNE-P arrangements.

81. BellSouth used August 2005 as the date it would begin the transition of the embedded

base of UNE-Ps (3.84 million) plus handle the worst case monthly unbundled loop volume (19,029) and the worst case monthly UNE-P growth volume (116,295). During each of the subsequent seven-month intervals, BellSouth would migrate one third of the embedded base. Thus, the worst case monthly hot cut volume at the region level would be 317,998 (that is, 19,029 + 116,295 + ((3.84M * 0.333)/7)). Because on average there are 22.3 business days per month, the daily volume becomes 14,260 (that is, 317,998 / 22.3) at the regional level. BellSouth's "worst case scenario" also accounted for the percent of hot cuts that related to Service Level 1 unbundled loops and Service Level 2 unbundled loops as well as for the percentage of CLECs' requests for coordinated hot cuts and non-coordinated hot cuts.

82. Taking all the assumptions into consideration, the model generated a load of a maximum of 277 hot cuts in a single central office per business day. Exhibit BLS-11 sets forth the expected load per day per central office in Florida. Based on this load, for Florida, the model yielded a force increase of an additional 687 central office employees in Florida and an additional 394 installation and maintenance employees. Using the "worst case scenario" daily volumes for Florida (29% of all the UNE-Ps in BellSouth's region) means that BellSouth would have to hire and train 425 technicians in the CWINS Centers and 105 service representatives in the LCSCs. BellSouth assumed for its "worst-case scenario" for the CWINS Centers that 50% of the migrations would be coordinated and thus would require CWINS involvement. BellSouth expects the number of coordinated migrations to actually be much less than this.

83. In order to handle increased hot cut demand with current force if relief is granted from unbundled circuit switching, Network Services is prepared to move personnel to locations

requiring additional staffing if the local employees cannot handle the increased load. As the Commission recognized in BellSouth's Section 271 proceedings, BellSouth's network forces and network processes and procedures are regional. BellSouth employees are trained in regional training centers and therefore can be relocated to areas requiring additional staffing when necessary. BellSouth methods and procedures are developed and maintained by a regional staff and therefore minimal training will be required for any loaned forces. If the additional staffing is required on a permanent basis, BellSouth's Network department will hire the necessary personnel to handle any increased load.

84. Insofar as scalability is concerned, BellSouth has over one hundred years of experience in managing force and load to ensure that it can provide excellent customer service. Managing force and load for hot cuts to provide UNE loops to BellSouth's wholesale customers is no different. Staffing the network forces to meet expected needs is business as usual for BellSouth. BellSouth's wholesale operations centers (that is, the LCSC and the CWINS) involved in the hot cut process are likewise scalable and staffing can be readily increased as demand warrants.

85. BellSouth's performance measurements demonstrate that BellSouth's LCSC and CWINS organizations are staffed sufficiently to handle the current volumes of unbundled loop orders. They also establish that BellSouth has scaled its resources as necessary to handle changes in volumes of such orders over the years. More fundamentally, the outstanding performance of the LCSC and CWINS in handling both steady growth and spikes in demand makes clear that BellSouth will continue to staff its LCSC and CWINS organizations sufficiently to handle any reasonably foreseeable demand for hot cut conversions. BellSouth has a strong incentive to ensure that the LCSC and CWINS are

adequately staffed to meet demand for all order types, including hot cut loops in that BellSouth remains subject to penalties and voluntary payments under its Self Effectuating Enforcement Measurements ("SEEMs") plan for performance failures.

86. The LCSC and CWINS personnel provide support across the entire range of wholesale products and services BellSouth makes available. Any increase in hot cut volumes resulting from the absence of UNE switching presumably would be accompanied by a decrease in order types that rely on UNE switching (i.e., UNE-P), such that the resources currently dedicated to one could then be devoted to the other. Initially, LCSC service representatives are hired and trained in a single product type, for example, residential resale or simple business resale or UNE-P. As service representatives become more proficient, additional training to handle other types of order requests is provided. With this cross training, many LCSC service representatives are able to handle multiple types of service order requests thus enabling the LCSC organization to move service representatives from one function to another. CWINS employees complete various levels of technical classroom training, in addition to receiving CWINS-specific training on the CLEC products or functions they are assigned to support. CWINS employees therefore are capable of handling provisioning, maintenance, and repair functions for a variety of wholesale products with minimal additional on-the-job training. The CWINS reallocates its employees among products as necessary to handle shift in demand.

87. As to BellSouth's ability to hire installation and maintenance employees, force and load management is something BellSouth has been doing for decades. BellSouth would hire the additional force by engaging its Human Resources Department. Human Resources would advertise the jobs in local media and conduct job fairs and testing events to screen

applicants. Human Resources would require 90 days from notification to employees being added to the payroll.

88. BellSouth will find these potential employees in technical schools, military bases, and other colleges. Based on the amount of downsizing that has occurred in the industry, many applicants may be looking for technical jobs such as those BellSouth would offer. In order to train new employees to sufficiently perform high quality hot cuts, it should be noted that hot cuts are not difficult. Consequently, BellSouth's basic training will permit employees to perform the hot cut functions. BellSouth trains new employees through its region-wide training program. Technical training is developed and delivered by a centralized BellSouth Training organization that operates training facilities in five (5) locations scattered throughout the nine-state region. These training locations are staffed with 35 people and are supplemented by contract trainers as needed. Approximately 70% of the training is performed at the training centers with the remaining 30% being "suitcased" to the various locations throughout the nine-state region. Technical personnel throughout the nine-states attend training at all of these locations depending on the subject matter and class sizes. Because the training is identical, it is irrelevant which location is selected. Training is divided by subject matter, rather than by geographic location. Consequently, BellSouth has more than enough training facilities to train these new network employees.

89. The training necessary to perform hot cuts will typically take between 15 to 35 days of mandatory training. In addition, employees receive on-the-job training related to their work assignments.

90. BellSouth has formed cutover teams in the past to handle central office conversions and

the 1996 Summer Olympic Games in Atlanta. BellSouth has also hired and trained temporary employees to help handle the increased summer workload. For example, BellSouth hired and trained 1,000 Service Technicians in 1999 to handle its service order and trouble load and to reduce overtime. During 1998 to 2001, BellSouth hired over 3,300 employees for its ENCORE systems (BellSouth's operations support systems and related interfaces supporting CLECs) and for its wholesale operations centers. During 2001 and 2002, BellSouth hired over 800 Service Technicians to handle increased ADSL demand. BellSouth organized its training around the tasks to be performed and focused its force on those tasks.

91. Some CLECs have expressed concern that a "potentially chaotic situation" could occur when multiple technicians work on the MDF. As stated earlier, BellSouth will manage the necessary conversions. While too many technicians working in a tight location can be cumbersome, BellSouth's technicians are trained to work efficiently and safely together. In addition, BellSouth intends to schedule the appropriate number of technicians on different shifts. This may require 24-hour per day scheduling, but BellSouth is willing to do such scheduling.

92. There are no limitations that BellSouth cannot manage around. Loop conversion work is just part of the overall work done on a daily basis in any given CO. Depending on the workload and lay out of the central office, anywhere from two (2) to ten (10) or more central office technicians may be at work simultaneously on the same Main Distributing Frame ("MDF") with no negative impact on productivity. Cable pairs are deployed on the MDF as cables are brought into the central office. Moreover, when multiple loop conversions are scheduled in a single day for a single central office, the pre-wiring work

may be done over several shifts in the days leading up to the due date. Because the access lines for these conversions are generally spread throughout the MDF (rather than being focused in only a small part), the actual cutovers are then accomplished without technicians interfering in each other's workspace. Finally, large hot cut quantities are project-managed. One of the benefits of project-management is to schedule the central office forces such that both the pre-wiring and the due date work can be accomplished without space constraints.

93. CLECs also expressed concern regarding BellSouth's ability to handle anticipated volumes of UNE-L orders in unmanned central offices. While true that BellSouth employees do not report to work daily at every one of its central offices, for those offices with a low volume of work, technicians are dispatched as needed to work the pending load, daily if required. Thus, while not all central offices are manned daily at the beginning of the workday, all BellSouth central offices are manned if work is required. BellSouth's force model includes hours for working conversions at all BellSouth central offices. Thus, BellSouth already has taken into account any so-called "unmanned" offices.

94. CLECs have claimed that BellSouth did not include travel time to unmanned central offices. As stated above, for those offices with a low volume of work, technicians are dispatched as needed to work the pending load, daily if required. Technicians would report to work in those offices when the cutovers are required and in most cases the technician would travel on his/her own time directly to the central office as a first assignment. The force model appropriately accounts for the work to be performed in the central office.

95. Finally, CLECs have questioned whether the ratio of supervision to employees was applied evenly across BellSouth's region or accounted for the geographic dispersion of the central offices. The ratio of supervision to employees was applied to the total technicians required. The supervision will be dispersed along with the technicians. In large metropolitan areas, BellSouth anticipates that technicians will be grouped for this particular project and will gain expertise from the daily hot cut repetition. However, in some less urban areas, technicians may be added to existing groups. BellSouth will staff the areas where the hot cuts are required with the appropriate technicians and supervisors.

VI. PROPOSED PERFORMANCE MEASUREMENTS

96. BellSouth proposes changes to the existing performance measurements plan to produce even more performance data to enable further monitoring of BellSouth's performance. These changes increase performance monitoring of the batch hot cut process, coordinated, and non-coordinated hot cuts. In addition, BellSouth proposes changes to the Self Effectuating Enforcement Mechanism ("SEEM") related to hot cuts. These changes are BellSouth's latest proposal to the state commissions, with Kentucky being the state with the most current proposal at the time of the preparation of this affidavit. Discussions with the CLECs and/or changes in BellSouth's business practices may give rise to the need to revise a measure as workshops or performance measurement hearings are conducted.

97. First, BellSouth does not currently measure pre-ordering and ordering functions for Batch Hot Cuts, in part because they are project managed. Therefore, BellSouth proposes to add a new Pre-Ordering measure to capture its performance in the initial stage of

processing a CLEC request for a batch conversion. BellSouth also plans to modify three (3) of the Ordering measurements to include project managed batch hot cuts that were previously excluded. BellSouth's Exhibit BLS-12 contains the proposed changes to the current Kentucky performance measurements to incorporate Batch hot cuts. Additions and/or changes to the existing performance measures are included in Exhibit BLS-12.

98. The existing hot cut timeliness measures CCCI and HCT only record data for coordinated hot cuts. In fact, the data necessary to produce these measurements are only available for coordinated hot cuts. It is not clear whether CLECs will elect to use coordinated or non-coordinated hot cuts to convert customers from UNE-P to UNE-L when switching is no longer a UNE. Therefore, BellSouth proposes to add one (1) new provisioning measure to capture BellSouth's performance on non-coordinated cutovers. Finally, there is one (1) change in the existing coordinated customer conversion interval measure to include the time to notify the CLEC that the cutover has been completed.

99. While batch hot cuts are not currently included in ordering measurement results, they are reflected in other measurements where applicable. Specifically, coordinated batch hot cuts are reflected in the four (4) hot cuts measures that were discussed previously (i.e., CCCI, HCT, RT, and PT). Order coordination is included on batch hot cuts involving designed loops. In cases where the loops ordered are not designed, CLECs can order batch hot cuts with or without order coordination. Therefore, the measures CCCI, HCT, and RT, would currently include batch hot cuts except in those cases where CLECs choose not to request order coordination for non-design loops. Both coordinated and non-coordinated batch hot cuts also show up in measures such as: PIAM, Percent Installation Appointments Met; FOCI, Firm Order Confirmation Average Completion

Interval (OCI); PPT, Percent Provisioning Troubles with 5 Days of Service Order Completion; PRAM, Percent Repair Appointments Met; CTRR: Customer Trouble Report Rate; and MAD, Maintenance Average Duration.

100. Further, for situations where the hot cut is associated with a number port (this permits the telephone number to be ported so that the end user can keep the same telephone number with the new carrier), Local Number Portability ("LNP") measures also apply. Specifically, hot cuts are already included in LNP measurements such as: LOOS, *LNP – Percent Out of Service < 60 Minutes*; LAT, *Percentage of Time BellSouth Applies the 10-Digit Trigger Prior to the LNP Order Due Date*; DTNT, *LNP- Average Disconnect Timeliness Interval (Non-Trigger).*

101. BellSouth proposes to add a Pre-Ordering measure, BMRT, UNE Bulk Migration – Response Time, if it receives unbundled switching relief. This proposed measurement is designed to capture the time that it takes for BellSouth to provide the requesting CLEC with a response to its UNE Bulk Migration Notification Form, which begins prior to the creation of a LSR. The submittal of this form by the CLEC triggers the assignment of a project manager to this request who handles providing a timely response back to the CLEC. The interval being measured begins upon receipt of the UNE Bulk Migration Notification Form by BellSouth and ends when a response is transmitted back to the CLEC. To meet the performance standard, BellSouth must provide a response to the CLEC within four (4) business days for bulk migration requests of less than 100 individual LSRs, within six (6) business days for 100 to 200 individual LSRs. Because the intervals for 201 or more LSRs are negotiated, no benchmark applies. The details of this measure are included in Exhibit BLS-12. Since processing of the Bulk Migration

Notification Form is the only ordering or pre-ordering process that is not covered by existing measurements, no additional measurements of ordering or pre-ordering are proposed. This measure will not be applicable once the web-based scheduling tool is available to the CLECs.

102. Hot cuts can be included in the ordering measures even though they are project managed because project management of Batch migrations does not affect the timeframes for processing the underlying LSRs after they are generated. Thus, the variability and uniqueness normally associated with project managed LSRs generally do not apply to Batch migrations once the individual LSRs are generated. These LSRs also have a unique project identifier that facilitates inclusion in the ordering measures by permitting them to be separately identified from other projects. BellSouth proposes to modify the exclusion for projects in the ordering measures to include batch migration LSRs. This Ordering measurement change is reflected in the Kentucky SQM for the following measures, attached as Exhibit BLS-12:

- RI: Reject Interval
- FOCT: Firm Order Confirmation Timeliness
- FOCRC: Firm Order Confirmation and Reject Response Completeness

103. An additional change is required to account for the unique type of LSR that a CLEC can submit in this case. Instead of submitting separate LSRs for each account that the CLEC wants to transfer, up to 99 accounts can be submitted on a single "global LSR". BellSouth's systems convert this global LSR into multiple separate LSRs needed to create service orders to provision the services. This process is unique to batch migrations. For these batch migration LSRs, the start time will be receipt of the global LSR, so the

same incoming timestamp will apply to each LSR spawned by the global LSR. The global LSR, however, will not be included in the count of LSRs because the individual LSRs resulting from the global LSR are the items that receive the reject or FOC responses that are tracked in reported results. The ordering measurements RI and FOCT have been modified to reflect this fact.

104. To display whether BellSouth meets its provisioning obligations for non-coordinated hot cuts, a new provisioning measure, CNDD, Non-Coordinated Customer Conversions - % Completed and Notified on Due Date, is proposed. Specifically, this new measure provides results indicating whether BellSouth completes a non-coordinated customer conversion on the due date and provides notification of completion to the CLEC on the same date. This is the obligation that BellSouth makes to CLECs on non-coordinated hot cuts. This measure is also proposed to be included in both Tier 1and Tier 2 of SEEM.

105. Provisioning measures currently include projects and, consequently, also include batch hot cuts. Thus, there is no need to change the existing provisioning measures to capture batch hot cuts. BellSouth is, however, proposing the modification of measure CCCI, Coordinated Customer Conversions Interval, to include the time to notify the CLEC that BellSouth has completed the conversion (see Exhibit BLS-12). This is an issue raised by the CLECs that BellSouth's hot cut interval does not include the time to notify the CLEC that the transfer is complete.

106. The current established standard for the conversion interval is 15 minutes per line. The objective time to notify the CLEC that the cutover has been completed is 5 minutes. Therefore, in adjusting this measure to include the time to notify the CLEC, the proposed standard conversions interval is changed from 15 minutes per line to 20 minutes per line.

The proposed changes to this measure are included in Exhibit BLS-12.

107. Any existing measurements that BellSouth has proposed to change that are currently in SEEM will remain in SEEM. Any new data that will be reflected in those measurements will be added to one of the existing SEEM disaggregations. The new measurement, P-7E, that BellSouth proposes to add to the Kentucky SQM is also proposed as a new measurement in the SEEM plan in both Tier 1 and Tier 2 as shown in Exhibit BLS-13.

VII. AT&T's PROPOSAL REGARDING ALTERNATIVES TO BELLSOUTH'S BATCH HOT CUT PROCESS

108. The Commission should not consider AT&T's Electronic Loop Provisioning ("ELP") process. AT&T earlier proposed to mechanize the hot cut process by advocating ELP. The ELP process is as follows: Where subscribers are served via copper loop facilities, i.e., no Digital Loop Carrier ("DLC") equipment is employed, ELP provides for the conversion of the analog voice grade signal to a digital format. When DLC is involved, that analog to digital conversion has already been done. After this conversion from analog to digital, the ELP concept provides for 'packetizing' the digital signal into Asynchronous Transfer Mode ("ATM") cells. (Note that despite AT&T's claims to the contrary, this packetization is not performed in any DLC systems used in BellSouth today). The ATM cells then transit an ATM switch. At the ATM switch, the ATM 'address' in the header of each cell is examined. Based on that destination address, the cell is then switched to the interface corresponding to the ILEC or CLEC serving that subscriber. Finally, a 'de-packetizing' device is positioned between the ATM switch and each LEC's switching system, to convert the digital signal in the ATM cells back into the

synchronous Time-Division-Multiplexed ("TDM") format necessary for interconnection to the switching system.

109. Since all carriers would be required to be connected to the ATM switch, the manual hot cut process could be replaced with a set of commands, hence the term 'Electronic Loop Provisioning.' Note that this process would require that every loop be connected to an ATM switch, a switch that does not exist in BellSouth's network today.

110. However, AT&T's ELP process cannot be justified for either technical or economic reasons. First, the existing manual hot cut process is reliable. Second, ELP cannot be justified based on its cost. The hot cut costs incurred by the incumbent and passed onto the CLEC that would be avoided with ELP is only a one-time cost of $13 per loop transferred versus a recurring monthly charge of $6.66 on all lines. In other words, BellSouth would need to charge an additional $6.66 per loop per month forever to both its retail and wholesale customers in order to recover ELP caused costs. Moreover, it would cost BellSouth approximately $8 billion in capital expenditures to implement ELP in its network – a cost that would ultimately need to be borne by consumers through higher rates or special surcharges. Third, ELP is not the best architecture to enable DSL and would impede DSL innovation.

111. The ELP cost estimate for copper loops is $339 per line; for DLC loops it is $299 per line. Based on the makeup of copper and DLC in BellSouth's region (roughly 60% of all loops are all-copper and 40% are on DLC), the melded cost per line is $323. To realize the stated goal of transferring the end user from the incumbents switch to a CLEC's switch via a 'software command', all loops must be modified to an ELP architecture. This is because neither BellSouth nor any CLEC knows in advance which customers the

CLEC will attain. The estimated cost to implement ELP is approximately $8 billion region-wide. In addition, this strands about $1.6 billion in analog line equipment for BellSouth and provides no improvement in DSL availability.

112. It would take at least several years to deploy ELP, given the magnitude of such an undertaking and given that each and every loop in BellSouth's region will need to be modified. Another factor to consider is that BellSouth does not have any of the DLC equipment that ELP requires. Moreover, even though BellSouth has some limited ATM switching capability, BellSouth does not have ATM switching in the locations, capacity, or quantity necessary to deploy ELP. Finally, BellSouth does not have the voice gateways necessary to connect ATM to voice in the right locations, capacity, or quantity.

VIII. SUMMARY

113. In summary, it should become readily apparent that BellSouth has well-established, well-documented, and well-tested processes in place that allow it to efficiently, reliably, and timely provision unbundled hot cut loops. Second, BellSouth repeatedly has demonstrated that it provisions CLEC hot cut orders on a timely basis, with minimal disruption to end users. Third, BellSouth has the capacity to meet any reasonably foreseeable increase in demand for stand alone unbundled loops (i.e., loops that are not ordered as a component of UNE-P) that might result from increased usage of competitive switching resulting from the elimination of BellSouth's obligation to provide unbundled switching. BellSouth's systems and processes are scalable and the capacity of those systems and processes may be readily increased as demand warrants. Fourth, BellSouth has for years accomplished loop cutovers affecting thousands of customers' service and

has done so with minimal service disruption or impairment. BellSouth can easily adapt its time tested CO conversion processes to accommodate mass cutovers of loops served by the so-called UNE-P into stand-alone loops served by the CLEC's switch (rather than BellSouth's switch) upon CLEC request.

114. This concludes our Affidavit.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Ken L. Ainsworth
Director
Interconnection Operations

Subscribed and sworn to before me

This 4th day of October, 2004

Notary Public

Gay P. Diz
Notary Public, DeKalb County
Georgia
My Commission Expires
February 09, 2007

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

W. Keith Milner
Assistant Vice President
Interconnection Operations

Subscribed and sworn to before me

This 4th day of October, 2004

Notary Public

Gay P. Diz
Notary Public, DeKalb County
Georgia
My Commission Expires
February 09, 2007

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Alphonso J. Varner
Assistant Vice President
Interconnection Operations

Subscribed and sworn to before me

This 4th day of October, 2004

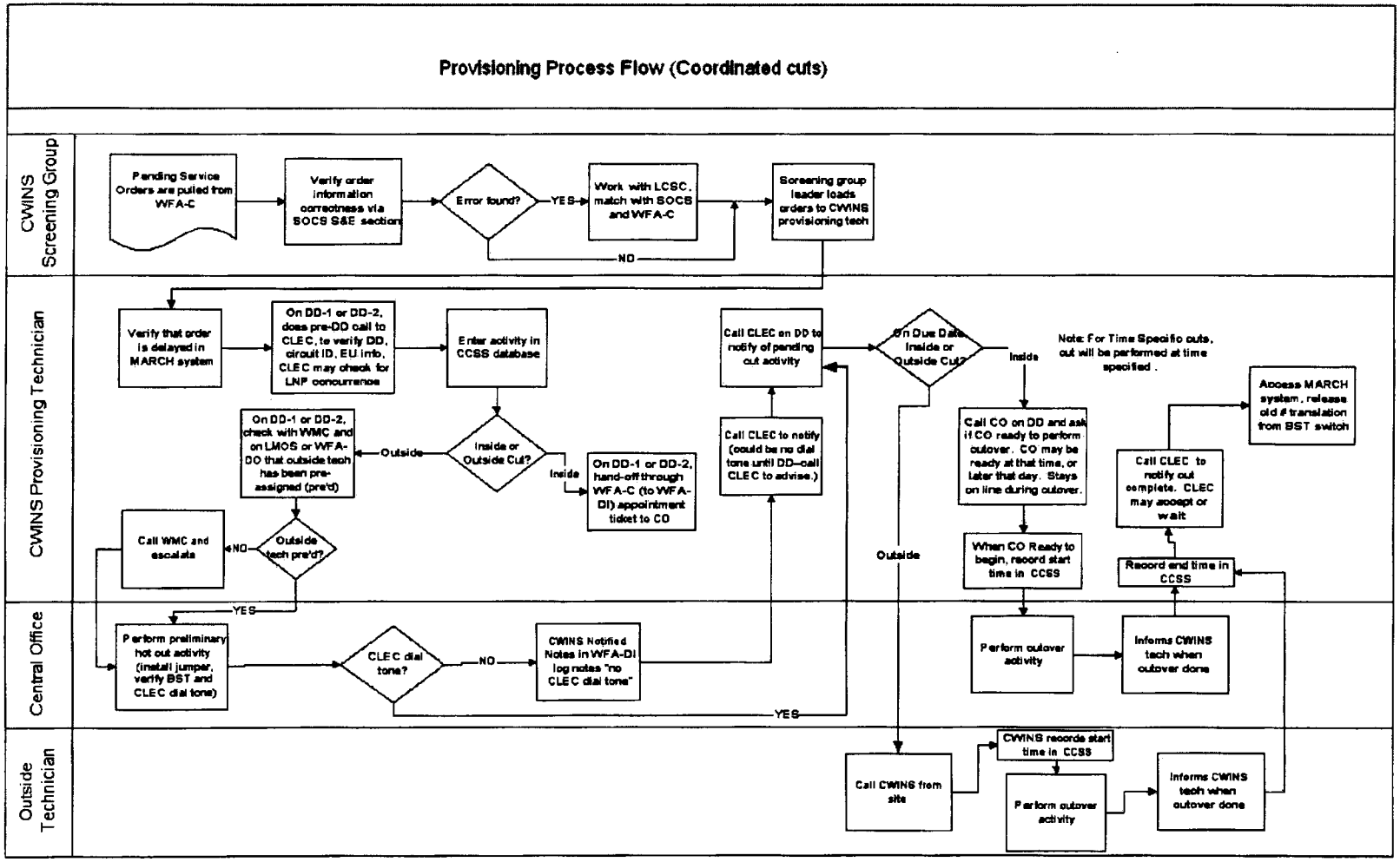
Notary Public

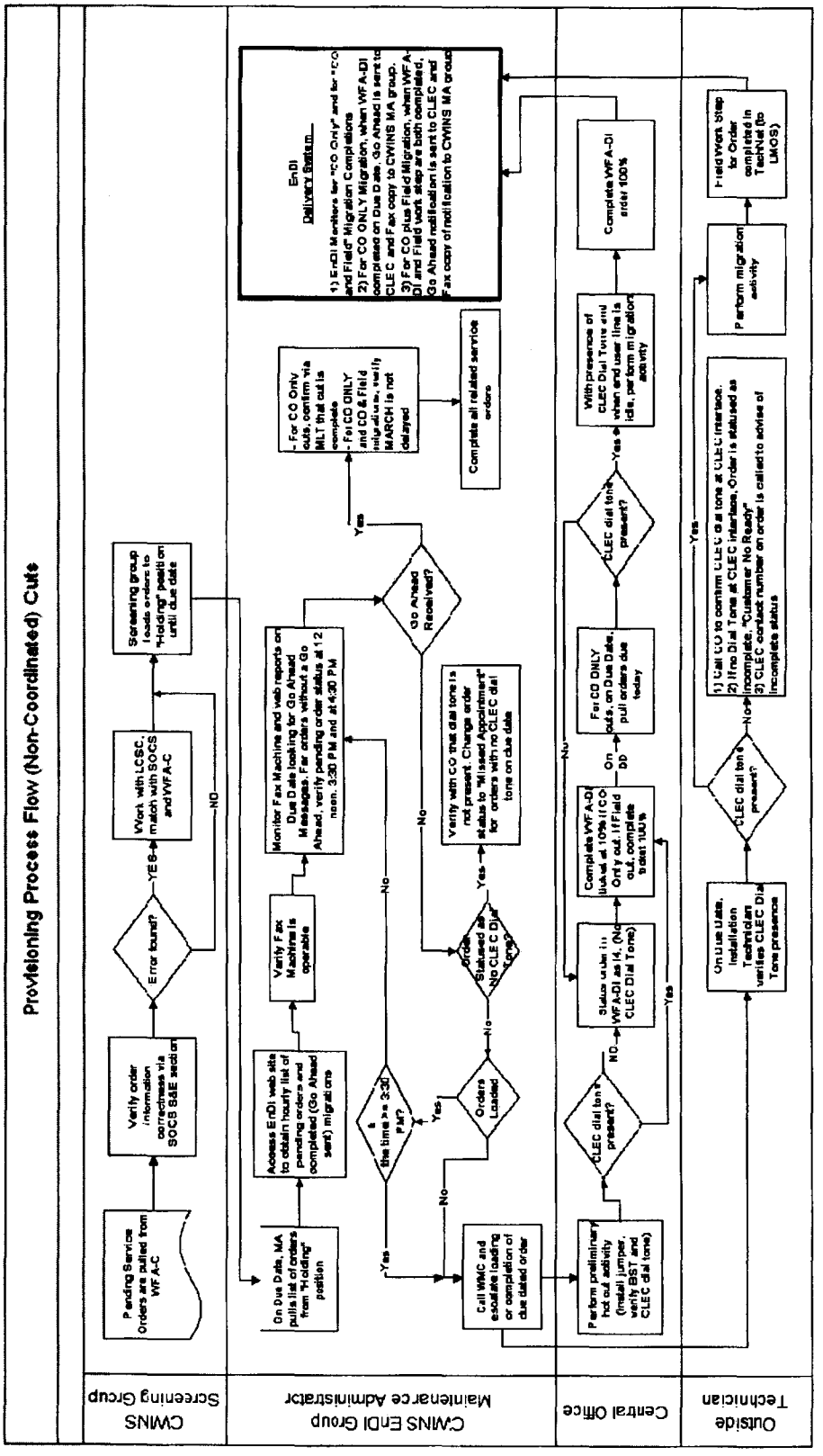
Gay P. Diz
Notary Public, DeKalb County
Georgia
My Commission Expires
February 09, 2007

WC Docket No. 04-313
CC Docket No. 01-338

Ainsworth, Milner and Varner Affidavit

Exhibit BLS - 1


Provisioning Process Flow (Coordinated cuts)
CWINS Screening Group
CWINS Provisioning Technician
Central Office
Outside Technician
Pending Service Orders are pulled from WFA-C
Verify order information correctness via SOCS S&E section
Error found?
YES
Work with LCSC, match with SOCS and WFA-C
NO
Screening group leader loads orders to CWINS provisioning tech
Verify that order is delayed in MARCH system
On DD-1 or DD-2, does pre-DD call to CLEC, to verify DD, circuit ID, EU info, CLEC may check for LNP concurrence
Enter activity in CCSS database
Inside or Outside Cut?
Outside
On DD-1 or DD-2, check with WMC and on LMOS or WFA-DO that outside tech has been pre-assigned (pre'd)
Inside
On DD-1 or DD-2, hand-off through WFA-C (to WFA-DI) appointment ticket to CO
Outside tech pre'd?
NO
Call WMC and escalate
YES
Perform preliminary hot cut activity (install jumper, verify BST and CLEC dial tone)
CLEC dial tone?
NO
CWINS Notified Notes in WFA-DI log notes "no CLEC dial tone"
YES
Call CLEC on DD to notify of pending cut activity
Call CLEC to notify (could be no dial tone until DD--call CLEC to advise.)
On Due Date Inside or Outside Cut?
Inside
Note: For Time Specific cuts, cut will be performed at time specified .
Outside
Call CO on DD and ask if CO ready to perform cutover. CO may be ready at that time, or later that day. Stays on line during cutover.
When CO Ready to begin, record start time in CCSS
Perform cutover activity
Informs CWINS tech when cutover done
Record end time in CCSS
Call CLEC to notify cut complete. CLEC may accept or wait
Access MARCH system, release old # translation from BST switch
Call CWINS from site
CWINS records start time in CCSS
Perform cutover activity
Informs CWINS tech when cutover done


Provisioning Process Flow (Non-Coordinated) Cuts
CWINS Screening Group
CWINS EnDI Group Maintenance Administrator
Central Office
Outside Technician
Pending Service Orders are pulled from WFA-C
Verify order information correctness via SOCS S&E section
Error found?
YES
NO
Work with LCSC, match with SOCS and WFA-C
Screening group loads orders to "Holding" position until due date
On Due Date, MA pulls list of orders from "Holding" position
Access EnDI web site to obtain hourly list of pending orders and completed (Go Ahead sent) migrations
Verify Fax Machine is operable
Monitor Fax Machine and web reports on Due Date looking for Go Ahead Messages. For orders without a Go Ahead, verify pending order status at 12 noon, 3:30 PM and at 4:30 PM
Is the time >= 3:30 PM?
Yes
No
Go Ahead Received?
Yes
No
Orders Loaded
Yes
No
Order Statused as "No CLEC Dial Tone"
Yes
No
Verify with CO that dial tone is not present. Change order status to "Missed Appointment" for orders with no CLEC dial tone on due date
Call WMC and escalate loading or completion of due dated order
- For CO Only cuts, confirm via MLT that cut is complete
- For CO ONLY and CO & Field migrations, verify MARCH is not delayed
Complete all related service orders
EnDI Delivery System
1) EnDI Monitors for "CO Only" and for "CO and Field" Migration Completions
2) For CO ONLY Migration, when WFA-DI completed on Due Date, Go Ahead is sent to CLEC and Fax copy to CWINS MA group.
3) For CO plus Field Migration, when WFA-DI and Field work step are both completed, Go Ahead notification is sent to CLEC and Fax copy of notification to CWINS MA group
Perform preliminary hot cut activity (Install jumper, verify BST and CLEC dial tone)
CLEC dial tone present?
NO
Yes
Status order in WFA-DI as I4, (No CLEC Dial Tone)
Complete WFA-DI linked at 10pm if CO Only cut. If Field cut, complete ticket 100%
On DD
For CO ONLY cuts, on Due Date, pull orders due today
CLEC dial tone present?
Yes
With presence of CLEC Dial Tone and when end user line is idle, perform migration activity
Complete WFA-DI order 100%
On due date, Installation Technician verifies CLEC Dial Tone presence
CLEC dial tone present?
No
1) Call CO to confirm CLEC dial tone at CLEC interface.
2) If no Dial Tone at CLEC interface, Order is statused as Incomplete, "Customer No Ready"
3) CLEC contact number on order is called to advise of Incomplete status
Yes
Perform migration activity
Field Work Step for Order completed in TechNet (to LMOS)

WC Docket No. 04-313
CC Docket No. 01-338

Ainsworth, Milner and Varner Affidavit

Exhibit BLS - 2

Unbundled Network Element Platform (UNE-P) and DSO Wholesale Local Platform Service to UNE-Loop (UNE-L) Bulk Migration

CLEC Information Package

Version 3
July 26, 2004

UNE-P to UNE-L Bulk Migration

Table of Contents

UNE-P to UNE-L Bulk Migration

1. Introduction & Scope

This Product Information Package is intended to provide CLECs general ordering information specific to the *UNE-P/DSO Wholesale Local Platform Service to UNE-L Bulk Migration* process described herein. Any UNE-P references, USOC definitions and procedures describe in this document and in other guides on the BellSouth Interconnection Web Site will also apply to the equivalent DSO Wholesale Local Platform Services. The DSO Wholesale Local Platform Service was formerly known as DSO Wholesale Local ***Voice*** Platform Service. This Information Package applies to both services.

The information contained in this document is subject to change. BellSouth will provide notification of changes to the document through the CLEC Notification Process.

Please contact your BellSouth Local Support Manager if you have any questions about the information contained herein.

2. Contract Requirements

The CLEC must have an Interconnection Agreement (IA) that includes terms and conditions for Bulk Migration. The IA must also include the terms, conditions and rates for each loop type to which the UNE-P services is migrated. The IA must be in effect for all states where the CLEC plans to order these unbundled loops.

The information contained herein applies to Bulk Migration and is part of the standard IA. The general offering is in accordance with BellSouth policies, procedures and regulatory obligations as well as the IA. The general offering does not address specific contract issues within a CLEC's IA that may be different from the general offering. Where specific contract language differs from the information provided here, the contract provisions will prevail for the term of the specific CLEC IA. Otherwise, the general offering provisions will apply.

UNE-P to UNE-L Bulk Migration

3. Revisions

3.1 Version 3

1) Modified **section 1 Introduction and Scope** to include the DSO Wholesale Local Platform Service reference.
2) Added **section 2 Contract Requirements** section.
3) Updated **sub-section 6.3 Two hour Go Ahead Notification** to include the Notification Tool reference.
4) Added new **sub-section 6.3.2 Web Based Notification Tool**.
5) Updated **section 11 Intervals** to reflect the reduction in the provisioning interval from 14 business days to 8 business days.

3.2 Version 2

1) Following are the revisions in section 5 "Bulk Migration Options" that are enhancements to the Bulk Migration process as referenced in Carrier Notification Letter SN91083967.

- After Hours/Weekend Migrations
- Two-Hour Go Ahead Notifications for SL1 non-coordinated migrations
- Time Windows for coordinated conversions
- Pre and Post order completion restoral process (Throwback)
- Same-Day end-user account migration
- CLEC to CLEC migration (UNE-P to UNE-L)

2) Additional revisions include interval reductions in the table in section 10.1 "**Bulk Migration Project Notification Interval**".

- For a "Maximum of 99" telephone numbers the CCPM interval has been reduced from 7 business days to 4 business days.
- For "100-200" telephone numbers, the CCPM interval has been reduced from 10 business days to 6 business days.

UNE-P to UNE-L Bulk Migration

4. Service Description

The Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Bulk Migration process may be used by a CLEC when migrating existing multiple non-complex UNE-P Services to a UNE-L offering.

All Bulk Migration orders will be project managed by a BellSouth Project Manager. Initially, the CLEC will submit required information to a BellSouth Customer Care Project Manager (CCPM) who after reviewing the bulk migration work effort with the field organizations will provide due dates back to the CLEC. Once the CLEC receives the due date information from the BellSouth Project Manager, the CLEC will electronically submit a Bulk Request for service order processing and provisioning. This allows migration of multiple UNE-P end-users to a UNE-L offering without submitting individual Local Service Requests.

UNE-P and UNE-L are defined below:

4.1 UNE-P

UNE-P is a UNE Port/Loop Switched Combination that combines a UNE local switch port and UNE loop to create an end-user-to-end-user transmission path and provides local exchange service. The CLEC may also choose to use the vertical services that are available through the features and functions of the local switch.

4.2 UNE-L

UNE-L is defined as the local loop network element that is a transmission facility between the main distribution frame (MDF) in BellSouth's central office and the point of demarcation at an end-user's premises. This facility will allow for the transmission of the CLEC's telecommunications services when connected to the CLEC's switch equipment. The local loop will require cross-connects for connection to the CLEC's collocation equipment. BellSouth does not provide telecommunications services with the UNE-L.

5. Bulk Migration Requirements

Major requirements for UNE-P to UNE-L Bulk Migration process are listed below. For complete requirements, refer to the **UNE to UNE Bulk Migration** section of the **Local Ordering Handbook** (LOH).

- Bulk Migration is available for migrating existing **non-complex** Port/Loop Combination services to Unbundled Loops with Local Number Portability (LNP).
- A UNE Loop will be provided for each ported telephone number formerly associated with the UNE-P Service.
- Complex UNE-P accounts are prohibited on Bulk Requests. Examples of Complex UNE-P are 2 Wire ISDN/BRI Digital Loop & Port UNE Combination, 4 Wire ISDN/PRI Digital Loop & Port UNE Combination, UNE-P Centrex, Digital Direct Integration Termination Service (DDITS), etc.
- The UNE-Ps that can be migrated are listed in the **UNE-P USOC** section.
- UNE-Ps can be migrated to the UNE-Ls listed in the **UNE-L USOC** section. These UNE-L types must be in the CLEC's Interconnection Agreement.

UNE-P to UNE-L Bulk Migration

Requirements (continued)

- Bulk Requests that require a change in existing loop facilities to a type of facility that is not available, resulting in a Pending Facility (PF) status on Due Date –7 days, must be cancelled by the CLEC and removed from the Bulk Request.
- All Existing Account Telephone Numbers (EATNs) on the Bulk Request must use the existing Regional Street Address Guide (RSAG) valid end-user address.
- All EATNs must be served from the same BellSouth Serving Wire Center (SWC).
- All UNE-Ps on a Bulk Request must be migrated to a single UNE-L type.
- No end-user moves or changes of address will be allowed on the Bulk Request.
- Non-Recurring rates for the specific loop type being requested will be charged.
- Service order charges for mechanized orders (SOMEC) will be charged based on the current rules for individual Local Service Requests (LSRs) created per EATN of a Bulk Request.
- A BellSouth Customer Care Project Manager (CCPM) will project manage the Bulk Request.
- CLEC must submit a **BellSouth UNE-P to UNE-L Bulk Migration Project Notification**, herein known as **Project Notification,** to the BellSouth CCPM prior to the CLEC's placing the mechanized Bulk Request.
- CLEC may specify Desired Due Dates (DDD) for each EATN. The BellSouth CCPM will negotiate due dates with Network Operations. Every effort will be made to accommodate the CLEC DDDs where force and load permits and minimum intervals are met.
- A minimum of two (2) EATNs and up to a maximum of ninety-nine (99) EATNs can be placed on a single Bulk Request.
- A maximum of twenty-five (25) end-user telephone numbers per EATN can be placed on a Bulk Request.
- No additional EATNs or end-user telephone numbers may be added to the *BellSouth UNE-P to UNE-L Bulk Migration Project Notification* form once it has been submitted to the BellSouth CCPM.
- Order Coordination-Time Specific option is not applicable for a Bulk Request.
- UNE-Ls that require a Service Inquiry and/or Unbundled Loop Modification are excluded from the Bulk Request process.
- A Reservation Identification (RESID) (also referred to as a Facility Reservation Number (FRN)) is required on the Bulk Request for Unbundled ADSL Compatible Loops, HDSL Compatible Loops and Unbundled Copper Loop - Designed (UCL-D). Refer to the **Unbundled ADSL and Unbundled HDSL Compatible Loop, UCL-Designed CLEC Information Packages** and **Loop Make-Up CLEC Information Package** for RESID/FRN requirements.
- When a Mechanized Loop Make Up with Facility Reservation Number (FRN) is requested, the CLEC must submit the Bulk Request with the FRN to BellSouth within 24 hours of receiving FRN.
- Firm Order Confirmation (FOC) will be sent on individual LSRs generated from the Bulk Request.
- Upon receipt of a Reject, CLEC must re-submit a corrected Bulk Request or submit a cancellation of the Bulk Request.

UNE-P to UNE-L Bulk Migration

6. Bulk Options

6.1 Order Coordination (Coordinated Hot Cut)

- Order Coordination (OC) is available in situations where there is a reuse of existing facilities for the UNE-L.
- OC is included with the UVL-SL2, 2 Wire ADSL and 2/4 Wire HDSL Loops at no additional charge.
- OC is available as a chargeable option for conversions to UVL-SL1, UCL-Non Designed and UCL-Designed Loops. OC must be requested at the EATN level on the Project Notification form. An OC charge will be applied to each loop on the EATN for which OC has been requested.

6.2 After Hours/Weekend Migrations

- Migrations will typically be completed during normal working hours of 8 a.m. – 5 p.m. However, for CLECs that have customers who need cutovers completed outside of normal business hours, after hours/weekend migrations are available at the CLECs request.
- The Project Notification Form includes a column titled "Special Handling". The CLEC provides its desired "Day" and "After Hours/Weekend" time window for the selected accounts at the EATN level in the Special Handling column according to the table below:

Days	After-hours Time-Windows	Minimum Lines	Maximum Lines	Special Considerations	Add'l charges
Mon – Fri [1]	7 a.m. – 8 a.m.	10	25	NA	Per CLEC's IA[3]
Mon – Fri [1]	5 p.m. – 7 p.m.	10	50	NA	Per CLEC's IA[3]
Saturday [1]	8 a.m. – 5 p.m.	50	100	UVL-SL1 Non-Coordinated only	Per CLEC's IA[3]
Mon-Fri [2]	7 p.m. – 12 midnight 6 a.m. – 7 a.m.	Individual Case Basis	Individual Case Basis	CO work only – no outside dispatches	Yes Overtime

[1] Extended Basic Hours
[2] Extended Overtime Hours
[3] Interconnection Agreement

6.3 Two (2) Hour Go Ahead Notification (For Non-Coordinated Bulk Migrations)

The Go Ahead Notification can be provided using one of two methods. The first method is through facsimile or email. The second method is through a web based Notification Tool. Both methods are described below:

UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

6.3.1 Facsimile or Email

- For ***non-coordinated*** non-designed migrations, the CLEC will be notified within a maximum of two (2) hours of the cutover.
- A Go Ahead Notification will be sent to the CLEC by facsimile* or email for UVL-SL1 and UCL-ND non-coordinated migrations.
- Once the CLEC is notified of the cutover completion, the CLEC can then complete the necessary number porting activities.

***Note**: To change from fax to email notification, the CLEC should contact its BellSouth Local Contract Manager (LCM) and provide its Alternate Exchange Carrier Number (AECN) and email address.

6.3.2 Web Based Notification Tool

The Notification Tool provides service order provisioning status associated with a non-coordinated migration for Non-Designed UNE-Ls. Additional information and access to the Notification Tool is via the Operations Report menu within the Performance Measurement and Analysis Platform (PMAP web site located at:

http://pmap.bellsouth.com

6.4 Time Windows for Coordinated Conversions

Time Windows for Coordinated Conversions are available for bulk migration orders at the CLEC's request as follows:

- There are two (2) time window options:
  - *8 a.m. – 12 p.m.*
  - *1 p.m. – 5 p.m.*
- CLEC will submit the Project Notification form and indicate the time window desired, at the EATN level, in the Special Handling column.
- Prior to the due date, the BellSouth CCPM will coordinate with Customer Wholesale Interconnection Network Services (CWINS) to ensure that CWINS and Network forces are scheduled and loaded to perform the migration in the designated 4-hour time window.
- On the due date, the coordinated cutover will take place using current provisioning processes.

6.5 Pre and Post Order Completion Restoral Process (or Throwback Process)

- The restoral process (also referred to as a throwback process) is available at the CLEC's request due to out-of-service issues and when the CLEC requires a restoral/throwback back to the UNE-P service.
- ***The restoral/throwback process can only occur within a twenty-four (24) hour window of the UNE-L order Due Date.***
- The CLEC will use follow the requirements in 6.5.1 or 6.5.2 or 6.5.3 below depending on whether the order is (1)coordinated/non-coordinated *completed* UNE-L order; (2)coordinated *not* completed UNE-L order; (3)non-coordinated *not* completed order:

UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

6.5.1 Coordinated or Non-Coordinated '*Completed*' UNE-L order

- CLEC submits Expedited LSR to the Local Carrier Service Center (LCSC) using one of the following fax numbers:
  - Birmingham Fax Server – 888-792-6271
  - Atlanta Fax Server – 888-581-6038
- The LSR Package requesting a throwback to UNE-P must contain the following information:

LSR Fields	Field information
LSR Remarks	Restoral UNE-L to UNE-P
REQTYP	M
Local Service Request Page	ACT = V MI = C, D
Port Service Page	LNA = V, G FA=N UNE-P Telephone Number
Port Service Page - ECCKT Field	UNE-L associated Loop Circuit ID
Directory Listing	Fill out as any other ACT=V migration request
EXP	Y

- The CLEC must advise the BellSouth CCPM of the restoral/throwback request.
- UNE-P Non-Recurring, Recurring and Expedite rates will be charged if applicable.

6.5.2 Coordinated '*Not Completed*' UNE-L Order

- CLEC calls the CWINS Provisioning Group to request restoral/throwback to the UNE-P and if the number porting has been completed, the CLEC requests port-back activity.
- Refer to the **CWINS Location and Hours** web site for CWINs telephone numbers.
- Orders will be placed in Missed Appointment (MA) status.
- CLEC submits supplemental (sup) order to cancel or reschedule conversion request.
- After receipt of the sup order FOC, the CLEC will create a new Subscription Version (SV).
- The CLEC must advise the BellSouth CCPM of the restoral/throwback request.

UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

6.5.3 Non-Coordinated *'Not Completed'* UNE-L order

- CLEC emails CWINS Enhanced Delivery (EnDI) Group to request restoral/throwback.
- CWINS EnDI email address is cwins.lnp@bellsouth.com
- Orders will be placed in MA status.
- If the number porting has been completed, the CLEC will call the Fleming Island LCSC Call Center at 800-872-3116 to request port-back activity before the CLECs submits a sup order.
- LCSC will advise the CLEC of port-back process.
- CLEC submits sup order to cancel or reschedule conversion request.
- After receipt of the sup order FOC, the CLEC will create a new Subscription Version (SV).
- The CLEC must advise the BellSouth CCPM of the restoral/throwback request.

6.6 Same-Day End-User Account Migrations

Same day End-user Account Migrations are available upon CLEC request. Same day end-user account migration means that all lines associated with an end-user from the same Serving Wire Center will be assigned the same due date.

- CLEC will group the same end-user accounts together on the Project Notification form.
- CLEC will submit the Project Notification form and indicate the same Due Date desired, at the EATN level, in the Special Handling column.
- The BellSouth CCPM will coordinate with the appropriate internal groups to ensure that all end-user account migration activity is performed on the same due date.

6.7 CLEC to CLEC Migration of UNE-P to UNE-L

This process is available with the Bulk Migration process as follows:

- CLEC (CLEC A) to CLEC (CLEC B) Migration of UNE-P to UNE-L is defined as a facility based CLEC (CLEC B) that is migrating the UNE-Ps, previously held by another CLEC (CLEC A), to UNE-Ls.
- CLEC B will prepare the Project Notification form using the same Bulk Migration requirements as specified within this document.
- The Project Notification form must contain all the necessary UNE-P and UNE-L information according to the requirements of the form.

CLEC B must have an end-user letter of authorization (LOA) on file (it must be available if requested).

UNE-P to UNE-L Bulk Migration

7. Bulk Migration Submission/Flow Process

The Bulk Request Submission Process will consist of two main work activities. The CLEC will first submit a Project Notification. Once the Project Notification has been processed and returned to the CLEC, the CLEC will then prepare and input the mechanized Bulk Request. The Bulk Request must be submitted according to the guidelines contained in the **LOH**. Below are the steps in the process :

Step #	Action
1	BellSouth CCPM receives Project Notification form from CLEC and negotiates/assigns Bulk Order Package Identifier (BOPI) and validates information (i.e., USOCs, Same Wire Center, etc.).
2	If pertinent information is missing on the Project Notification package, the form is returned to CLEC along with a reason(s) for return. BellSouth CCPM receives corrected Project Notification from the CLEC and continues the negotiation process.
3	BellSouth CCPM contacts BellSouth's Network organization and negotiates Due Date (DD) for all related Purchase Order Numbers (PONs) in the Bulk package and returns Bulk Notification Form including negotiated DD to the CLEC.
4	Upon receipt of the Bulk Notification Form that includes negotiated DD from BellSouth CCPM, CLEC submits Bulk Request package with negotiated dates for each EATN/PON via electronic ordering interface.
5	If the CLEC wants to supplement (SUP) (01,02,03) an individual PON, the request must be sent through the same electronic ordering system as the original Bulk Request.
6	At this point, the Bulk Request package will be processed for 1st level validation and any rejects will be mechanically generated to the CLEC.
7	The electronic ordering systems will accept the Bulk Request package, break the individual PONs into separate LSRs and populate the remaining required LSR fields from Operation Support System (OSS) systems prior to sending the individual LSRs downstream to the Local Number Portability (LNP) Gateway.
8	The LNP Gateway will perform 2nd level validations and provide any fallouts, per "business as usual" processes. The Local Carrier Service Center (LCSC) will handle all fallouts as normal. Any of the individual PONs that must be clarified will be sent back to the CLEC, business as usual.
9	After LNP Gateway issues the service orders, the LCSC will handle all manual service order fallouts as normal. The BellSouth Service Representative will send any PF and Missed Appointments (MA) to the CLEC via a jeopardy notice.
10	LNP Gateway will send an FOC on each individual PON associated with the Bulk Request package, to the CLEC.
11	The Project Manager will monitor PON, Service Order and Porting Statuses associated with the Bulk Request package. BellSouth's Service Representative and Project Manager will monitor the LNP gateway for the "Number Ported" messages and the Service Representative will handle manual port out order processing if required.

UNE-P to UNE-L Bulk Migration

8. BellSouth UNE-P to UNE-L Bulk Migration Project Notification Process

Following is the Project Notification process:

- Complete the **BellSouth UNE-P to UNE-L Bulk Migration Project Notification** form according to the instructions.
- Electronically submit the ***Project Notification*** to the email address of the CLEC's assigned BellSouth Customer Care Project Manager (CCPM). For help with identifying a BellSouth CCPM, the CLEC should contact its BellSouth Customer Support Manager.
- The BellSouth CCPM will review the information submitted by the CLEC and will assign a Bulk Order Package Identifier (BOPI) that the CLEC will later use on the electronic Bulk Request.
- The BellSouth CCPM will coordinate with BellSouth's field forces to schedule the migration Due Dates.
- Once the review with the field forces is complete, the BellSouth CCPM will include the Due Dates on the ***Project Notification*** and return it to the CLEC.
- No additional EATNs or end-user telephone numbers may be added to the ***Project Notification*** form once it has been submitted to the BellSouth CCPM.

UNE-P to UNE-L Bulk Migration

9. UNE-P USOCs

The UNE-P Services that can be migrated to UNE-L are represented by the Port USOCs listed in the table below:

Port USOC	Unbundled Port/Loop Combination Element	Description of Combinations using an Unbundled Exchange Port (UEP):
UEPBX	UEPLX	UEP, Business, 2 Wire Analog Business Line Port, UNE=P Basic Class of Service
UEPRX	UEPLX	UEP, Residence, 2 Wire Analog Residence Line Port, UNE-P Basic Class of Service
UEPCO	UEPLX	UEP, Coin Basic Class of Service UNE-P
UEPBV	UEPLX	UEP, Remote Call Forwarding, Business Basic Class of Service
UEPVR	UEPLX	UEP, Remote Call Forwarding, Residence Basic Class of Service

10. UNE-L USOCs

Below are the UNE-L types and associated USOCs to which the UNE-Ps can be migrated:

Loop USOC	Description
UEAL2	2 Wire Unbundled Voice Loop – SL1
UEAL2, UEAR2	2 Wire Unbundled Voice Loop – SL2
UCLPW	2 Wire Unbundled Copper Loop/Short– Designed without manual Service Inquiry
UCL4W	4 Wire Unbundled Copper Loop/Short – Designed without manual Service Inquiry
UEQ2X	2 Wire Unbundled Copper Loop – Non-Designed
UAL2W	2 Wire Unbundled ADSL Loop without manual Service Inquiry
UHL2W	2 Wire Unbundled HDSL Loop without manual Service Inquiry
UHL4W	4 Wire Unbundled HDSL Loop without manual Service Inquiry

UNE-P to UNE-L Bulk Migration

11. Intervals

11.1 Bulk Migration Project Notification Interval

- The "*CCPM Targeted Response Interval*" column in the table below represents the targeted number of business days in which the BellSouth CCPM will respond back to the CLEC.
- The CLEC must submit the **Project Notification** in advance of the earliest CLEC's requested Desired Due Date (DDD) according to the "*Minimum # of days in advance to submit Project Notification*" column in the table below. This column represents the number of days that the Project Notification must be submitted in advance of the earliest DDD.
- "*Minimum # of days*" column includes the interval for the BellSouth CCPM to negotiate the Due Dates. It allows three (3) days for the CLEC to correct, process and submit the mechanized Bulk Request. It also includes eight (8) days in order to meet the 8-business day submission requirement for the Bulk Request.
- The BellSouth CCPM will attempt, where possible, to assign the work such that migrations occur on the requested DDD.

# of end-user Tel. Numbers	CCPM Targeted Response Interval	CLEC days after receipt from Proj Mgr	Bulk Request Submission Requirement	Minimum # of days in advance to submit Project Notification
Maximum of 99	4 business days	3 business days	8 business days	15 business days
100-200	6 business days	3 business days	8 business days	17 business days
201 +	To be determined	3 business days	8 business days	Contact CCPM

11.2 Bulk Request Service Order Intervals

- The BellSouth CCPM will negotiate the Bulk Request due dates with BellSouth's provisioning personnel and will communicate the due date to the CLEC.
- The CLEC must submit the Bulk Request and it must be accepted by the mechanized system at least eight (8) business days in advance of the earliest Due Date for any end-user telephone number to be migrated.

11.3 Example of Intervals

An example of Intervals follows:

- March 1, 2004 - CLEC submits Project Notification with 87 end-user telephone numbers to the BellSouth CCPM
- March 5, 2004 (4 business days) – the BellSouth CCPM sends the Project Notification with firm Due Dates to the CLEC
- March 8 – March 10 (3 business days) – CLEC will prepare and submit mechanized Bulk Request via the electronic interface.
- March 22, 2004 (8 business days) – the earliest assigned Due Date on the Project Notification returned to the CLEC.

UNE-P to UNE-L Bulk Migration

12. Acronyms

AECN	Alternate Exchange Carrier Number
ADSL	Asymmetrical Digital Subscriber Line
BOPI	Bulk Order Package Identifier
CCPM	Customer Care Project Manager
CHC	Coordinated Hot Cut
CLEC	Competitive Local Exchange Carrier
CWINS	Customer Wholesale Interconnection Network Services
DDD	Desired Due Date
EATN	Existing Account Telephone Number
EnDI	Enhanced Delivery
FOC	Firm Order Confirmation
FRN	Facility Reservation Number
HDSL	High-Bit-Rate Digital Subscriber Line
LCSC	Local Carrier Service Center
LNP	Local Number Portability
LSR	Local Service Request
MDF	Main Distribution Frame
OC	Order Coordination
OSS	Operation Support System
PON	Purchase Order Number
RESID	Reservation Identification
RSAG	Regional Street Address Guide
SUP	Supplemental
SWC	Serving Wire Center
UCL-D	Unbundled Copper Loop – Designed
UCL-ND	Unbundled Copper Loop – Non-Designed
UNE-P	Unbundled Network Element-Port/Loop Combination
UNE-L	UNE Loop

WC Docket No. 04-313
CC Docket No. 01-338

Ainsworth, Milner and Varner Affidavit

Exhibit BLS - 3

Batch Due Date Scheduler

"Currently Under Development"

- ***Implementation October 2004***
- ***Replaces current spreadsheet process***
- ***Properties***
  - ***Allows CLECs the ability to select Batch migration due dates from a WEB-based application***
  - ***Provides CLEC with BOPI (Bulk Order Project ID)***
  - ***Maximum of 200 loops per day per central office***
    - ***Maximum of 125 loops per day per central office per CLEC***
    - ***Multiple CLECs can schedule in the same central office not to exceed the 200 loop limit***
  - ***Allows migration selections for dispatched and non-dispatched***
  - ***Allows special handling request for after hour scheduling***
  - ***Allows special handling for AM and PM windows on coordinated migrations***

WC Docket No. 04-313
CC Docket No. 01-338

Ainsworth, Milner and Varner Affidavit

Exhibit BLS - 4

Non-coordinated Notification Web Tool

"As of July, 2004"

- **Provides list of non-coordinated pending orders by due date**
- **Provides list of "go ahead" notifications with time stamp**
- **Provides CLEC no dial tone notification with time stamp *(Under Development)***
- **Attached are draft screen prints of information to be contained in system**

BELLSOUTH

(CLEC NAME)
CLEC LIST OF PENDING ORDERS
Due Date 02/22/2004
7:00AM

SVCREQID	REUSESVCORD	PON	PROJNUM	*OUTSIDE DISP* OSP REQ	*INSIDE DISP* CO REQ	CIRCUIT ID
NR111111	CQREUxxxxxx	PON123456	ABC12345	Y		80.TYNU.xxxxxx..SB
NR222222	CQREUxxxxxx	PON123457		Y		80.TYNU.xxxxxx..SB
NR333333	CQREUxxxxxx	PON123458		N	Y	80.TYNU.xxxxxx..SB
NR444444	CQREUxxxxxx	PON123459		Y		80.TYNU.xxxxxx..SB
NR555555	CQREUxxxxxx	PON123460		N	Y	80.TYNU.xxxxxx..SB
NR666666	CQREUxxxxxx	PON123461	123ABC	N	Y	80.TYNU.xxxxxx..SB

GRAND TOTAL **6**

BELLSOUTH

GO-AHEAD NOTIFICATION
January 22, 2004

CLEC: (CLEC OCN)

BellSouth SVC ORD Number	Due Date	Wire Center	Circuit Identification	Purchase Order Number	Project Number	Notification Date/Time
NR111111	1/22/04	954761	80.TYNU.xxxxxx..SB	PON123456	ABC123 45	1/22/04 10:32 am
NR222222	1/22/04	954761	80.TYNU.xxxxxx..SB	PON123457		1/22/04 10:42 am
NR333333	1/22/04	954761	80.TYNU.xxxxxx..SB	PON123458		1/22/04 10:52 am
NR444444	1/22/04	954761	80.TYNU.xxxxxx..SB	PON123459		1/22/04 10:53 am

WEB Report Updated 1/22/04 @ 11:15a

BELLSOUTH

Currently Under Development

"CLEC No Dial Tone Notification"
January 22, 2004

CLEC: (CLEC OCN)

The following order/circuit (s) have been have been placed into CLEC – No Dial Tone status.

BellSouth SVC ORD #	Due Date	Circuit Identification	Purchase Order Number	Project Number	Placed on CLEC – No Dial Tone Status
NR777777	1/23/04	80.TYNU.667xxxSB	PON123456		1/22/04 10:30 am
NR555555	1/22/04	80.TYNU.xxxxxxSB	PON123460		1/21/04 09:00 am

WEB Report Updated 1/22/04 @ 11:15a

WC Docket No. 04-313
CC Docket No. 01-338

Ainsworth, Milner and Varner Affidavit

Exhibit BLS - 5

BellSouth Telecommunications, Inc.

Report on the BellSouth Bulk Migration and Regional Tests

December 22, 2003

BellSouth Telecommunications, Inc.
Bulk Migration Process and Regional Tests

Table of Contents

Supplementary Information

PRICEWATERHOUSECOOPERS

PricewaterhouseCoopers LLP
10 Tenth Street, Suite 1400
Atlanta GA 30309-3851
Telephone (678) 419 1000
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Report of Independent Accountants

To Management of BellSouth Telecommunications, Inc.

We have examined management's assertion, included in the accompanying *Management Assertions on BellSouth Telecommunications' Bulk Migration Process*, that BellSouth Telecommunication, Inc. (BellSouth) utilized the BellSouth Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Process (Bulk Migration Process Document) to complete its test of Bulk Migration service requests for three central offices in Florida. The test of the Bulk Migration Process was initiated on October 30, 2003 and completed on December 11, 2003. Management is responsible for the Company's assertion. Our responsibility is to express an opinion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence supporting management's assertion and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

Our examination identified certain instances where BellSouth deviated from the Bulk Migration Process criteria defined in the accompanying *Management Assertions on BellSouth Telecommunications' Bulk Migration Process* and all are outlined in Attachment A.

In our opinion, except for the deviations from the criteria described in Attachment A, BellSouth utilized the Bulk Migration Process, in all material respects, to complete its test of Bulk Migration Service Requests for three central offices in Florida that was initiated on October 30, 2003 and completed on December 11, 2003, based on the criteria defined in the accompanying *Management Assertions on BellSouth Telecommunications' Bulk Migration Process*.

This report is intended solely for the information and use of BellSouth Corporation and BellSouth Telecommunications, Inc. and appropriate regulatory agencies and is not intended to be and should not be used by anyone other than these specified parties. However, this report is a matter of public record and distribution is not limited.

Pricewaterhousecoopers LLP

PricewaterhouseCoopers LLP
December 18, 2003

Attachment A

Exceptions to Management Assertions on
BellSouth Telecommunications' Bulk Migration Process

The following issues have been numbered sequentially and have not been prioritized based on the significance of the issue.

1. While observing the BellSouth Bulk Migration Process test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone upon commencing the Hot Cut Process for three lines. Once the Central Office Technician could not obtain a BellSouth dial tone, troubleshooting procedures were performed to resolve the issue. The BellSouth dial tone was restored by having the number downloaded to the switch translation tables. The elapsed time from the initial BellSouth dial tone check to the restoration of BellSouth dial tone was approximately 40 minutes for each line. The Field Office Technician then completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

2. While observing the BellSouth Bulk Migration Process test, we noted that three cutovers were completed and dial tone could not be reestablished within 15 minutes. Once dial tone was reestablished the BellSouth Technician successfully verified CLEC dial tone and completed an ANAC test.

3. While observing the BellSouth Bulk Migration Process test, we noted that for two orders the due dates were missed. Both orders were scheduled to be cutover on December 11, 2003. However, one of the two orders was cutover on December 5, 2003 and the other order was not cutover by December 11, 2003.

4. While observing the BellSouth Bulk Migration Process test, we noted the Field Office Technician was unable to ANAC the BellSouth dial tone for 19 lines prior to the cutover. The Field Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

5. While observing the BellSouth Bulk Migration Process test, we noted for one order that a Central Office Technician completed an ANAC on the BellSouth line prior to the cutover and received the wrong telephone number. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

6. While observing the BellSouth Bulk Migration Process test at the Arch Creek central office on December 4, 2003, PwC noted that the frame attendant did not test for CLEC dial tone prior to performing the hot cut for 6 telephone numbers. The frame attendant verified the cutover was successfully completed via a dial tone and ANAC test subsequent to the cutover.

7. The BellSouth Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Process document states that UNE-L 2 wire unbundled copper loop-non designed and Remote Call Forwarding services can be submitted as Bulk Orders. However, BellSouth's electronic ordering systems will reject UNE-L 2 wire unbundled copper loop-non designed (UCL-ND) and Remote Call Forwarding services that would be included on Bulk Migration orders.

8. While observing the process for the completion of bulk migration orders, we noted that EnDI emails were not being received by the CLEC for 49 non-coordinated lines. We noted that 47 of the lines were

cutover on December 2, 2003 and two of the lines were cutover on December 11, 2003. The EnDI emails provide notification to the CLECs that the cutover has been completed.

BELLSOUTH

Management Assertions on BellSouth Telecommunications' Bulk Migration Process

Management of BellSouth Telecommunications (BellSouth) asserts that:

BellSouth's Unbundled Network Element—Port/Loop Combination (UNE-P) to Unbundled Network Element—Loop (UNE-L) Process (Bulk Migration Process) will enable the bulk migration of Competitive Local Exchange Carrier (CLEC) customers. BellSouth's Bulk Migration Process Version 1 is published at http://interconnection.bellsouth.com/ dated March 26, 2003. BellSouth has utilized its Bulk Migration Process to complete a test of Bulk Migration service requests for three central offices in Florida from October 30, 2003 through December 11, 2003, with the exception of those items presented in Attachment B. During the test, BellSouth submitted test local service requests as a simulated CLEC, and processed the service requests through the provisioning process, however BellSouth did not send NPAC messages. The BellSouth Bulk Migration Test has been defined in Sections V and VI of this report.

The following describes the term "utilized" criteria:

Bulk Process Migration Test

BellSouth Management asserts that Management utilized the Bulk Migration Process during their test of the Bulk Migration service requests. As it relates to this assertion, "utilized" will be assessed according to the following:

- BellSouth processed the service requests as per the Bulk Migration Submission/Flow Process included in the Bulk Migration Process.
- BellSouth completed all edit and validation checks on the service requests that are included in the Bulk Migration Process.
- BellSouth was able to convert all test lines by the due dates, up to 125 lines per day per central office, and reestablished dial tone on the CLEC CFA Block.
- BellSouth assigned local service request due dates according to the intervals defined by the Bulk Migration Process.
- BellSouth processed only those services (i.e., USOCs) that are included in the Bulk Migration Process.

William N. Stacy
Network Vice President
Interconnection Services

Attachment B

The following issues have been numbered sequentially and have not been prioritized based on the significance of the issue:

1. While observing the BellSouth Bulk Migration Process test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone upon commencing the Hot Cut Process for three lines. Once the Central Office Technician could not obtain a BellSouth dial tone, troubleshooting procedures were performed to resolve the issue. The BellSouth dial tone was restored by having the number downloaded to the switch translation tables. The elapsed time from the initial BellSouth dial tone check to the restoration of BellSouth dial tone was approximately 40 minutes for each line. The Field Office Technician then completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

2. While observing the BellSouth Bulk Migration Process test, we noted that three cutovers were completed and dial tone could not be reestablished within 15 minutes. Once dial tone was reestablished the BellSouth Technician successfully verified CLEC dial tone and completed an ANAC test.

3. While observing the BellSouth Bulk Migration Process test, we noted that for two orders the due dates were missed. Both orders were scheduled to be cutover on December 11, 2003. However, one of the two orders was cutover on December 5, 2003 and the other order was not cutover by December 11, 2003.

4. While observing the BellSouth Bulk Migration Process test, we noted the Field Office Technician was unable to ANAC the BellSouth dial tone for 19 lines prior to the cutover. The Field Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

5. While observing the BellSouth Bulk Migration Process test, we noted for one order that a Central Office Technician completed an ANAC on the BellSouth line prior to the cutover and received the wrong telephone number. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

6. While observing the BellSouth Bulk Migration Process test at the Arch Creek central office on December 4, 2003, PwC noted that the frame attendant did not test for CLEC dial tone prior to performing the hot cut for 6 telephone numbers. The frame attendant verified the cutover was successfully completed via a dial tone and ANAC test subsequent to the cutover.

7. The BellSouth Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Process document states that UNE-L 2 wire unbundled copper loop-non designed and Remote Call Forwarding services can be submitted as Bulk Orders. However, BellSouth's electronic ordering systems will reject UNE-L 2 wire unbundled copper loop-non designed (UCL-ND) and Remote Call Forwarding services that would be included on Bulk Migration orders.

8. While observing the process for the completion of bulk migration orders, we noted that EnDI emails were not being received by the CLEC for 49 non-coordinated lines. We noted that 47 of the lines were cutover on December 2, 2003 and two of the lines were cutover on December 11, 2003. The EnDI emails provide notification to the CLECs that the cutover has been completed.

PRICEWATERHOUSECOOPERS

PricewaterhouseCoopers LLP
10 Tenth Street, Suite 1400
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Report of Independent Accountants

To Management of BellSouth Telecommunications, Inc.:

We have examined management's assertion, included in the accompanying *Management Assertions on BellSouth Telecommunications' Hot Cut Process*, that the Hot Cut Process, as it relates to the physical Unbundled Network Element—Port/Loop Combination (UNE-P) to Unbundled Network Element—Loop (UNE-L) migration, used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same process used for non-bulk hot cuts in BellSouth's region, as of December 18, 2003. Management is responsible for the Company's assertion. Our responsibility is to express an opinion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence supporting management's assertion and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

We noted that sufficient Hot Cut order volume did not exist within Alabama and Kentucky; accordingly, we could not perform any testing over the Hot Cut Process in those states.

Our examination identified certain instances where BellSouth Field or Central Office Technicians deviated from the Hot Cut Process defined in the accompanying *Management Assertions on BellSouth Telecommunications' Hot Cut Process* and all are outlined in Attachment C.

In our opinion, except for the deviations from the criteria described in Attachment C, the Hot Cut Process used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same process, in all material respects, as the process used for non-bulk hot cuts in BellSouth's region, as of December 18, 2003, based on the criteria set forth in the accompanying *Management Assertions on BellSouth Telecommunications' Hot Cut Process*.

This report is intended solely for the information and use of BellSouth Corporation and BellSouth Telecommunications, Inc. and appropriate regulatory agencies and is not intended to be and should not be used by anyone other than these specified parties. However, this report is a matter of public record and distribution is not limited.

PricewaterhouseCoopers LLP

PricewaterhouseCoopers LLP
December 18, 2003

Attachment C

Exceptions to Management Assertions on
BellSouth Telecommunications' Hot Cut Process

The following issues have been numbered sequentially and have not been prioritized based on the significance of the issue:

1. While observing the BellSouth Bulk Migration Process test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone upon commencing the Hot Cut Process for three lines. Once the Central Office Technician could not obtain a BellSouth dial tone, troubleshooting procedures were performed to resolve the issue. The BellSouth dial tone was restored by having the number downloaded to the switch translation tables. The elapsed time from the initial BellSouth dial tone check to the restoration of BellSouth dial tone was approximately 40 minutes for each line. The Field Office Technician then completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

2. While observing the BellSouth Bulk Migration Process test, we noted that three cutovers were completed and dial tone could not be reestablished within 15 minutes. Once dial tone was reestablished the BellSouth Technician successfully verified CLEC dial tone and completed an ANAC test.

3. While observing the BellSouth Bulk Migration Process test, we noted that for two orders the due dates were missed. Both orders were scheduled to be cutover on December 11, 2003. However, one of the two orders was cutover on December 5, 2003 and the other order was not cutover by December 11, 2003.

4. While observing the BellSouth Bulk Migration Process test, we noted the Field Office Technician was unable to ANAC the BellSouth dial tone for 19 lines prior to the cutover. The Field Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

5. While observing the BellSouth Bulk Migration Process test, we noted for one order that a Central Office Technician completed an ANAC on the BellSouth line prior to the cutover and received the wrong telephone number. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

6. While observing the BellSouth Bulk Migration Process test at the Arch Creek central office on December 4, 2003, PwC noted that the frame attendant did not test for CLEC dial tone prior to performing the hot cut for 6 telephone numbers. The frame attendant verified the cutover was successfully completed via a dial tone and ANAC test subsequent to the cutover.

7. While observing Hot Cuts across BellSouth's region, we noted that the central office technician did not perform a pre-cut dial tone and ANAC test for the BellSouth and CLEC lines prior to performing the hot cut for seven telephone numbers. We noted that the central office technician did not perform a pre-cut dial tone and ANAC test on the CLEC line prior to performing the hot cut for two additional telephone numbers. We also noted that the BellSouth Technician completed each cutover and successfully verified CLEC dial tone and completed an ANAC test.

8. While observing Hot Cuts across BellSouth's region test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone for one line prior to the cutover. The Central Office

Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

9. While observing Hot Cuts across BellSouth's region, we noted that a cutover was completed despite a service order in a Missed Appointment status. Due to the service order being in a Missed Appointment status, an EnDI fax was not sent to the CWINS center.

BELLSOUTH

Management Assertions on BellSouth Telecommunications' Hot Cut Process

Management of BellSouth Telecommunications (BellSouth) asserts that:

The Bulk Migration Process requires central office and field technicians to physically perform the Unbundled Network Element—Port/Loop Combination (UNE-P) to Unbundled Network Element—Loop (UNE-L) migration (the Hot Cut Process). The Hot Cut Process used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same Process used for non-bulk hot cuts in BellSouth's region, as of December 18, 2003, with the exception of those items noted in Attachment D, based on the criteria below. A description of BellSouth's test of its Bulk Migration Process has been included in Sections V and VI of this report.

The following describes the terms "same" and "Hot Cut Process" criteria:

Hot Cut Process

As it relates to this assertion, "same" is defined as:

The Hot Cut Process for non-bulk hot cuts will be considered the same as the Hot Cut Process used during the Bulk Migration Process Test if each of the steps defined as the "Hot Cut Process" below for Central and Field Office Hot Cuts are completed for each process. As it relates to this assertion, the "Hot Cut Process" will be defined as the following processes:

Central Office Hot Cuts

1. **Order Receipt** – Central Office (CO) Technicians receive hot cut information associated with service orders via Work Force Administrator-Dispatch In (WFADI) and Switch/FOMS.
2. **Install Jumpers** – The CO technician will install jumpers according to the Switch/FOMS instructions.
3. **Pre-cut Dial Tone and ANAC Testing** – CO technician will test for dial tone and ANAC on the existing BellSouth pair and on the CFA block.
4. **Cutover** – The CO technician performs the cutover according to the Switch/FOMS assignment instructions on the Due Date. Coordinated conversions, as ordered by CLECs, will be performed when advised by the CWINS. Non-coordinated conversions, as ordered by CLECs, will be performed anytime on the Due Date.
5. **Post-Cut Dial Tone Test** – For coordinated cuts, the CO Technician tests the cutover on the BellSouth Cable Pair to ensure that dial tone has been restored and the proper phone number is received.
6. **CLEC Notification**
   a. For Non-Coordinated Hot Cuts, the CO technician completes the WFA-DI work-step, which will also send a completion to Switch/FOMS. Also, the Enhanced Delivery Initiative system (EnDI) system sends a fax or email to the CLEC and a fax to the CWINS center as notification that the Hot Cut is complete.
   b. For Coordinated Hot Cuts, the CO technician advises the CWINS that the cut is complete.

Field Office Hot Cuts

1. Order Receipt – Field Office (FO) receives hot cut orders via LMOS/IDS (non-design) or WFA-DO/IDS (dispatch out design), and CO Technicians receive hot cut order information via WFA-DI and Switch/FOMS.
2. CO Install Jumper – The CO technician will install jumpers according to the Switch/FOMS instructions.
3. CO Continuity Test – The CO technician performs a continuity test to ensure that the jumper from the FI Block to the CLEC CFA Block has continuity.
4. CO Completion – The CO technician completes the WFA-DI work step, which will also send a completion to Switch/FOMS.
5. Field Wiring – The CO technician will install jumpers according to the LMOS or WFA-DO instructions.
6. Pre Conversion/Migration Dial Tone & ANAC Test
   a. BellSouth Dial Tone - Non-Coordinated & Coordinated - Field Technician will verify dial tone and ANAC to verify results match disconnect order.
   b. CLEC Dial Tone
      1. Non-Coordinated - On Due Date, Field Technician checks for CLEC dial tone on universal and copper lines.
      2. Coordinated SL1 or SL2 - On Due Date, for universal and copper lines the Field Technician checks for CLEC dial tone, ANACs, and provide Telephone Number to CWINS to verify accuracy.
7. Field Cutover – The FO technician performs the cutover of the customer line.
8. Post-Cut Dial Tone Test – For coordinated cuts, the FO Technician will test the cutover to ensure that dial tone has been restored and the proper phone number is received.
9. CLEC Notification
   a. For Non-Coordinated Hot Cuts, the FO technician completes the workstep in the WFA-DO/IDS or LMOS/IDS system. Also, FnDI sends a fax or email to the CLEC and a fax to the CWINS center as notification as the Hot Cut is complete.
   b. For Coordinated Hot Cuts, the FO technician completes the workstep in the WFA-DO or LMOS systems and advises the CWINS that the cut is complete.

William N. Stacy

William N. Stacy
Network Vice President
Interconnection Services

Attachment D

The following issues have been numbered sequentially and have not been prioritized based on the significance of the issue.

1. While observing the BellSouth Bulk Migration Process test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone upon commencing the Hot Cut Process for three lines. Once the Central Office Technician could not obtain a BellSouth dial tone, troubleshooting procedures were performed to resolve the issue. The BellSouth dial tone was restored by having the number downloaded to the switch translation tables. The elapsed time from the initial BellSouth dial tone check to the restoration of BellSouth dial tone was approximately 40 minutes for each line. The Field Office Technician then completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

2. While observing the BellSouth Bulk Migration Process test, we noted that three cutovers were completed and dial tone could not be reestablished within 15 minutes. Once dial tone was reestablished the BellSouth Technician successfully verified CLEC dial tone and completed an ANAC test.

3. While observing the BellSouth Bulk Migration Process test, we noted that for two orders the due dates were missed. Both orders were scheduled to be cutover on December 11, 2003. However, one of the two orders was cutover on December 5, 2003 and the other order was not cutover by December 11, 2003.

4. While observing the BellSouth Bulk Migration Process test, we noted the Field Office Technician was unable to ANAC the BellSouth dial tone for 19 lines prior to the cutover. The Field Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

5. While observing the BellSouth Bulk Migration Process test, we noted for one order that a Central Office Technician completed an ANAC on the BellSouth line prior to the cutover and received the wrong telephone number. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

6. While observing the BellSouth Bulk Migration Process test at the Arch Creek central office on December 4, 2003, PwC noted that the frame attendant did not test for CLEC dial tone prior to performing the hot cut for 6 telephone numbers. The frame attendant verified the cutover was successfully completed via a dial tone and ANAC test subsequent to the cutover.

7. While observing Hot Cuts across BellSouth's region, we noted that the central office technician did not perform a pre-cut dial tone and ANAC test for the BellSouth and CLEC lines prior to performing the hot cut for seven telephone numbers. We noted that the central office technician did not perform a pre-cut dial tone and ANAC test on the CLEC line prior to performing the hot cut for two additional telephone numbers. We also noted that the BellSouth Technician completed each cutover and successfully verified CLEC dial tone and completed an ANAC test.

8. While observing Hot Cuts across BellSouth's region test, we noted the Central Office Technician was unable to ANAC the BellSouth dial tone for one line prior to the cutover. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

9. While observing Hot Cuts across BellSouth's region, we noted that a cutover was completed despite a service order in a Missed Appointment status. Due to the service order being in a Missed Appointment status, an EnDI fax was not sent to the CWINS center.

Supplementary Information

SECTION V – EXECUTIVE OVERVIEW

A. Overview of Reports

In recognition that the Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Bulk Migration Process (Bulk Migration Process Document) may be used by a CLEC to migrate existing multiple non-complex UNE-P services to a UNE-L offering, BellSouth has completed a test of Bulk Migration service requests for three central offices in Florida. The management of BellSouth requested that PricewaterhouseCoopers LLP (PricewaterhouseCoopers) perform an independent examination surrounding BellSouth's assertion that:

- BellSouth has utilized the Bulk Migration Process during their test of the Bulk Migration service requests for three central offices in Florida; and that,
- The Hot Cut Process, as it relates to the physical Unbundled Network Element—Port/Loop Combination (UNE-P) to Unbundled Network Element—Loop (UNE-L) migration, used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same process used for non-bulk hot cuts in BellSouth's region.

The management of BellSouth has provided herein a description of the Bulk Migration Test completed in Florida and the Regional Test, as well as the criteria for the assertions noted above. BellSouth Management is responsible for identification of the criteria underlying its assertion of utilizing the Bulk Migration Process Document and the sameness of the Hot Cut Process across its region.

B. Objective of Supplementary Test Information

The objective of this information is to provide a description of the Bulk Migration Test that was completed in Florida from October 30, 2003 through December 11, 2003, and the Regional Test that ended on December 18, 2003.

SECTION VI – BULK MIGRATION AND REGIONAL TESTS

To demonstrate the effectiveness of the Bulk Migration Process, BellSouth conducted a test for three central offices in Florida. For the BellSouth Bulk Migration Florida Test, (the Test), BellSouth simulated an operational CLEC, (Pseudo CLEC) which submitted multiple Bulk Migration Orders. The Test was completed following the guidelines outlined by the Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Bulk Migration Process (Bulk Migration Process Document). BellSouth completed the following during the Test:

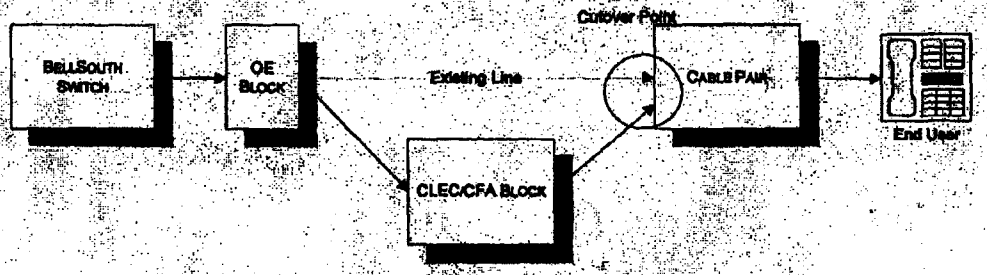
- BellSouth established a UNE-P Test Bed in three Central Offices in Florida. Florida is expected to be the first state to have a CLEC exercise the Bulk Migration Process. UNE-P telephone numbers (TNs) were established based on the make-up of outside plant facilities within the state, with approximately 50% on copper, 14% on Universal Digital Loop Carrier (UDLC), and 36% on Integrated Digital Loop Carrier (IDLC). Additionally, approximately 85% of the TNs were established as residential class of service, while 10% were business and 3% were coin. The remaining 2% were spread between business and residence classes of service for remote call forwarding solutions.

- The Pseudo CLEC created and submitted 724 Bulk Migration service orders. The submission process included interaction with a BellSouth Project Manager to assign due dates, submission of LSRs through BellSouth's electronic ordering gateways, (i.e., TAG, LENS and EDI), and interaction with the BellSouth CWINS during the provisioning of the service orders.

- Service requests submitted by the Pseudo CLEC were processed through BellSouth's systems and service centers as normal transactions.

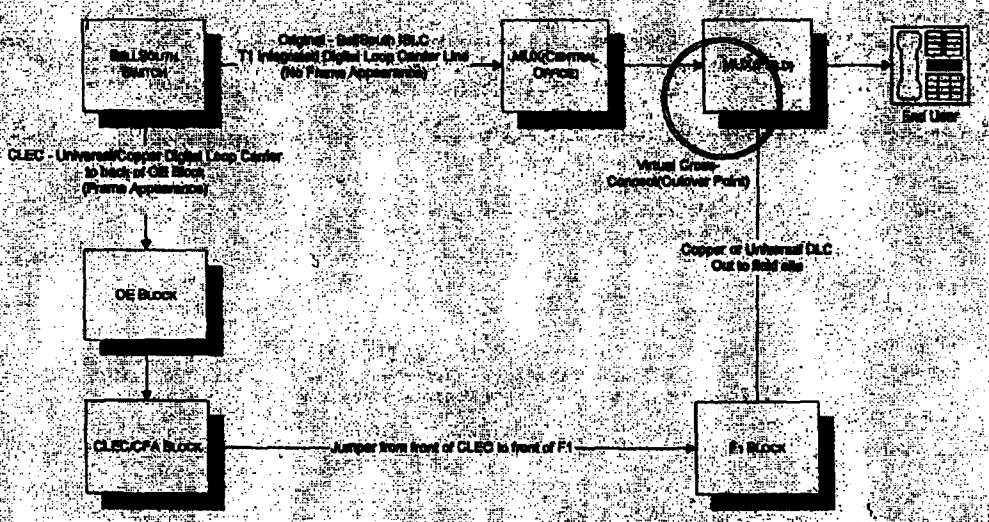
- During a typical copper or universal CLEC Hot Cut, the CLEC will deliver dial tone from its own switch to a collocation point in a BellSouth Central Office. The CLEC collocation points are hard wired to a CLEC Block on the BellSouth Distributing Frame in the central office. Due to BellSouth operating as a Pseudo CLEC, BellSouth had to deliver dial tone from its own switch to its Pseudo CLEC Block on the Distributing Frame. This was accomplished by wiring the BellSouth OE Block to the Pseudo CLEC Block on the Distributing Frame for universal and copper services. Refer to Figure 1.0 for a diagram for the generation of Pseudo CLEC dial tone.

Figure 1.0



- During a typical Integrated CLEC Hot Cut, the CLEC will deliver dial tone from its own switch to a collocation point in a BellSouth Central Office. The CLEC collocation points are hard wired to a CLEC Block on the BellSouth Distributing Frame in the central office. Due to BellSouth operating as a Pseudo CLEC, BellSouth had to deliver dial tone from its own switch to its Pseudo CLEC Block on the Distributing Frame. Refer to Figure 1.1 for a diagram for the generation of Pseudo CLEC dial tone. IDLC facilities have no physical appearance on the BellSouth frame. BellSouth established a second set of TNs that were wired to an OB block on the BellSouth frame then to the CLEC CFA block to simulate dial tone for the CLEC switch.

Figure 1.1



- The Test was completed for a total of 758 lines, which include 724 lines processed in accordance to the Bulk Migration Process and 34 lines processed as single orders for Remote Call Forwarding (RCF) and 2 Wire Unbundled Copper Loop-Non Design (UCL-ND). RCF and UCL-ND migrations were initially submitted as Bulk Migration orders, however they were rejected by the electronic ordering systems.

- The central offices included in the Test were West Hollywood, Arch Creek and Perrine.

- The Test did not include the sending of NPAC messages, since the lines in the test were to remain with BellSouth. The Test also did not include a billing verification for those charges that were incurred by the Pseudo CLEC.

BellSouth Telecommunication, Inc.
Bulk Migration Test-Draft

To demonstrate that the Hot Cut Process as it relates to the physical Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element (UNE-L) migration, used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same process used for non-bulk hot cuts in BellSouth's region, BellSouth completed the following:

- BellSouth has instituted the same work instructions for central office and field technicians for Hot Cuts throughout its region.
- The Hot Cut process utilized by the Bulk Migration Process is the same process utilized by BellSouth for each hot cut provisioned throughout the BellSouth region. Hot Cuts are subject to the same provisioning steps to be completed regardless of their status as a bulk/non-bulk order.

SECTION VII - GLOSSARY

AICPA	American Institute of Certified Public Accountants
ANAC	Automatic Number Announcing Circuit
BOPI	Bulk Order Package Identifier
CFA	CLEC Facility Assignment
CLEC	Competitive Local Exchange Carrier
CO	Central Office
CWINS	Customer Wholesale Interconnection Network Services Center
DOE	Direct Order Entry
EATN	Existing Account Telephone Number
EDI	Electronic Data Interchange
EnDI	Enhanced Delivery Initiative
EXACT	Exchange Access Carrier Tracking
FO	Field Office
FOC	Firm Order Confirmation
IDLC	Integrated Digital Loop Carrier
IDS	Integrated Dispatch System
LAUTO	LNP Service Order Generator
LCSC	Local Carrier Service Center
LENS	Local Exchange Navigation System
LMOS	Loop Management Operations System
LNP Gateway	Local Number Portability Gateway
LOTT	Local Order Testing Tube
LSR	Local Service Request
MA	Missed Appointment
MUX	Multiplexer
NPAC	Number Portability Administration Center

PM	Project Management
PON	Purchase Order Number
SOCS	Service Order Communication System
SUPS	Supplemental
SWITCH/FOMS	Frame Operations Management System
TAG	Telecommunication Access Gateway
TN	Telephone Number
UDLC	Universal Digital Loop Carrier
UNE	Unbundled Network Element
UNE-L	Unbundled Network Element-Loop
UNE-P	Unbundled Network Element-Port
USOC	Universal Service Order Code
WFA	Work Force Administrator
WFA-C	Work Force Administrator – Corporate
WFA-DI	Work Force Administrator – Dispatch In
WFA-DO	Work Force Administrator – Dispatch Out

WC Docket No. 04-313
CC Docket No. 01-338

Ainsworth, Milner and Varner Affidavit

Exhibit BLS - 6

AFFIDAVIT OF PAUL M. GAYNOR

State of Georgia)
)
County of Fulton)

Paul Gaynor, having first been duly sworn, hereby states as follows:

1. I am a Principal in PricewaterhouseCoopers LLP's (PwC's) Telecommunications Industry Practice. In this capacity, I am responsible for providing information technology assurance services to PwC's telecommunications clients. I have over 16 years of relevant experience including performing audits of financial statements and attestations in a variety of industries. In addition, I have spent 3 years as an internal auditor in the financial services and manufacturing industries. I have 2 years experience working the telecommunications industry for a Competitive Local Exchange Carrier (CLEC), where I was responsible for all systems and operations.
2. I directed and coordinated PwC's performance of an attestation examination of the BellSouth Telecommunications, Inc. management assertions that: (1) BellSouth has utilized its Unbundled Network Element-Port Loop Combination (UNE-P) to Unbundled Network Element-Loop (UNE-L) Process (Bulk Migration Process) as it completed a test of Bulk Migration service requests for three central offices in Florida; and (2) Whether the Hot Cut Process used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same Process used for non-bulk hot cuts in BellSouth's region.
3. This affidavit was prepared to provide additional detail of the types of procedures PwC utilized in our attest examination on BellSouth's management assertions as of December 18, 2003 described within our report dated December 18, 2003, included as Attachment A.

4. A total of 17 PwC professionals spent over 2,500 hours performing the work described in this affidavit. The PwC professionals included 4 partners, a director, and 2 senior managers. Our partners, director and senior managers led all aspects of the fieldwork. All of the PwC partners, director and senior managers, and many of the staff, who worked on this engagement, have extensive telecommunications industry and telecommunications business process and/or systems experience.

5. The attestation examination discussed herein was conducted in accordance with the attestation standards of the American Institute of Certified Public Accountants (AICPA). An attestation examination is one in which a practitioner is engaged to issue a written communication that expresses a conclusion about the reliability of a written assertion that is the responsibility of another party. An attestation examination is the highest level of assurance that can be provided on a written assertion under these standards. PwC's conclusions regarding its attestation examination of BellSouth's management assertions are set forth in the "Independent Accountant's Report" which is appended hereto as Attachment A. Also, a copy of the BellSouth management assertion is appended hereto as Attachment A.

6. BellSouth Management asserted the following: (First Assertion)
BellSouth has an Unbundled Network Element—Port/Loop Combination (UNE-P) to Unbundled Network Element—Loop (UNE-L) Process (Bulk Migration Process) that will enable the bulk migration of Competitive Local Exchange Carrier (CLEC) customers. BellSouth's Bulk Migration Process Version 1 is published at http://interconnection.bellsouth.com/ dated March 26, 2003. BellSouth completed a test of Bulk Migration service requests for three central offices in Florida. During the test,

BellSouth submitted local service requests as a Pseudo CLEC, and processed the service requests through the provisioning process; however, BellSouth did not send NPAC messages. The BellSouth Bulk Migration Test has been defined in paragraph 11.

7. BellSouth Management asserts that Management utilized the Bulk Migration Process during their test of the Bulk Migration service requests. As it relates to this assertion, "utilized" will be assessed according to the following:
   - BellSouth processed the service requests as per the Bulk Migration Submission/Flow Process included in the Bulk Migration Process.
   - BellSouth completed all edits and validation checks on the service requests that are included in the Bulk Migration Process.
   - BellSouth was able to convert all test lines by the due dates, up to 125 lines per day per central office, and reestablished dial tone on the CLEC CFA Block.
   - BellSouth assigned local service requests due dates according to the intervals defined by the Bulk Migration Process.
   - BellSouth processed only those services (i.e., USOCs) that are included in the Bulk Migration Process.
8. BellSouth Management also asserted the following: (Second Assertion)
   The Bulk Migration Process required central office and field technicians to physically perform the Unbundled Network Element—Port/Loop Combination (UNE-P) to Unbundled Network Element—Loop (UNE-L) migration (the Hot Cut Process). The Hot Cut Process used by the central office and field technicians during BellSouth's test of its Bulk Migration Process is the same Process used for non-bulk hot cuts in BellSouth's region based on the criteria below.

9. The following described the terms "same" and "Hot Cut Process" criteria:

As it relates to this assertion, "same" was defined as:

- The Hot Cut Process for non-bulk hot cuts will be considered the same as the Hot Cut Process used during the Bulk Migration Process Test if each of the steps defined as the "Hot Cut Process" below for Central and Field Office Hot Cuts are completed for each process. As it relates to this assertion, the "Hot Cut Process" will be defined as the following processes:

Central Office Hot Cuts

1. Order Receipt – Central Office (CO) Technicians receive hot cut information associated with service orders via Work Force Administrator-Dispatch In (WFA-DI) and Switch/FOMS.
2. Install Jumpers – The CO technician will install jumpers according to the Switch/FOMS instructions.
3. Pre-cut Dial Tone and ANAC Testing – CO technician will test for dial tone and ANAC on the existing BellSouth pair and on the CLEC CFA block.
4. Cutover – The CO technician performs the cutover according to the Switch/FOMS assignment instructions on the Due Date. Coordinated conversions, as ordered by CLECs, will be performed when advised by the CWINS. Non-coordinated conversions, as ordered by CLECs, will be performed anytime on the Due Date.
5. Post-Cut Dial Tone Test – For coordinated cuts, the CO Technician tests the cutover on the BellSouth Cable Pair to ensure that dial tone has been restored and the proper phone number is received.
6. CLEC Notification

A. For Non-Coordinated Hot Cuts, the CO technician completes the WFA-DI work-step, which will also send a completion to Switch/FOMS. Also, the Enhanced Delivery Initiative (EnDI) system sends a fax or email to the CLEC and a fax to the CWINS center as notification that the Hot Cut is complete.

B. For Coordinated Hot Cuts, the CO technician advises the CWINS that the cut is complete.

Field Office Hot Cuts

1. Order Receipt – Field Office (FO) receives hot cut orders via LMOS/IDS (non-design) or WFA-DO/IDS (dispatch out, design), and CO Technicians receive hot cut order information via WFA-DI and Switch/FOMS.
2. CO Install Jumper – The CO technician will install jumpers according to the Switch/FOMS instructions.
3. CO Continuity Test – The CO technician performs a continuity test to ensure that the jumper from the F1 Block to the CLEC CFA Block has continuity.
4. CO Completion – The CO technician completes the WFA-DI work-step, which will also send a completion to Switch/FOMS.
5. Field Wiring – The CO technician will install jumpers according to the LMOS or WFA-DO instructions.
6. Pre Conversion/Migration Dial Tone & ANAC Test
   a. BellSouth Dial Tone - Non-Coordinated & Coordinated - Field Technician will verify dial tone and ANAC to verify results match disconnect order.
   b. CLEC Dial Tone

1. Non-Coordinated - On Due Date, Field Technician checks for CLEC dial tone on universal and copper lines.
2. Coordinated SL1 or SL2 - On Due Date, for universal and copper lines the Field Technician checks for CLEC dial tone, ANACs, and provide Telephone Number to CWINS to verify accuracy.

7. Field Cutover – The FO technician performs the cutover of the customer line.
8. Post-Cut Dial Tone Test – For coordinated cuts, the FO Technician will test the cutover to ensure that dial tone has been restored and the proper phone number is received.
9. CLEC Notification
   a. For Non-Coordinated Hot Cuts, the FO technician completes the workstep in the WFA-DO/IDS or LMOS/IDS system. Also, EnDI sends a fax or email to the CLEC and a fax to the CWINS center as notification as the Hot Cut is complete.
   b. For Coordinated Hot Cuts, the FO technician completes the workstep in the WFA-DO or LMOS systems and advises the CWINS that the cut is complete.

Engagement Planning

10. PwC completed a walkthrough of Hot Cut transactions to gain an understanding of the key project notification, ordering and provisioning activities; this included observing live Hot Cuts prior to testing to further our understanding of the provisioning process. Next, PwC developed a detailed test plan that included testing of the Bulk Migration Process key actions. For example, the receipt of a firm order confirmation and reestablishment of

customer service within 15 minutes were considered two of the key actions in the ordering and provisioning of Bulk Migrations. Refer to the *PwC Testing* section of this affidavit for a complete description of the key actions tested by PwC.

11. PwC assessed the threshold for exception reporting based on our understanding of the Bulk Migration and Hot Cut Processes. Refer to our report dated December 18, 2003, which has been included as Attachment A, for a description of all issues that exceeded the exception reporting threshold. The exception reporting threshold had been established according to the following:

- PwC identified key action points within the Bulk Migration Process. PwC identified an exception if during the BellSouth Bulk Migration Process, local service request transactions did not successfully pass each key action point at least 95% of the time. The basis for selecting 95% was historic acceptance by external parties that hold organizations to a high standard, but not an unachievable standard.
- PwC also identified an exception where customer service would have been impacted for greater than 15 minutes, regardless of the percentage of transactions affected (i.e., not subject to the 95% threshold). The Hot Cut process inherently affects customer service. However, PwC determined that any customer service that is affected for greater than 15 minutes would be deemed an exception.
- PwC applied professional judgment to determine exceptions that do not meet the criteria above, however may be required to be reported. For example, if the Bulk Migration Process of local service request transactions successfully passed a key action point 95% of the time and customer service is not impacted, it would not be deemed an exception based on the criteria above. However, due to the criticality of select action

points within the Bulk Migration Process (i.e., completing dial tone checks prior to cutover of a line), PwC has held these transactions to a "Higher Standard". Refer to the *Exceptions* section of this affidavit for a description of all exceptions identified.

Florida Bulk Migration Process Test

12. Our examination covered the submission of the project notification by the Pseudo CLEC, the review of the project manager activities as stated in the Bulk Migration Process document, the activities of the Local Carrier Service Center (LCSC), the submission of the orders into the Service Order Communications System (SOCS), the activities of the Customer Wholesale Interconnection Network Services Center (CWINS), the provisioning process including the actual hot cut, as well as the close out of the order in Work Force Administration (WFA) and Switch/FOMS. PwC reviewed the following documentation to gain an understanding of the BellSouth Bulk Migration process:

- The Bulk Migration Process Document
- Bulk Ordered UNE-P Port Out with Loop Process Flow (BellSouth)
- BellSouth procedures for Central Office Operations for UNBUNDLED Local Loop Service
- UNE-P to UNE-L Bulk Migration Overview
- Bulk Migration Process for Non-Coordinated SL1 Orders
- Screening Work Process for Designed and Non Designed Provisioning
- Network SSI&M / I&M Methods and Procedures For Provisioning Unbundled Network Elements Unbundled Voice Loops
- Enhanced Delivery Initiative Process for SL1 Group

- LNP-UNE to UNE Bulk Migration (UNE-P to UNE L) [Mechanized Procedures]
- Network SSI&M / I&M Methods and Procedures For Provisioning Unbundled Network Elements Unbundled Copper Loop-Non-Designed (UCL-ND)
- Unbundled Non-Designed (SL1) and (SL2) Voice Grade Loops-SL1 Wiring and Testing Work Steps
- Customer Care Project Management-UNE-P to UNE-L Bulk Migration Process

13. To demonstrate the effectiveness of the Bulk Migration Process, BellSouth developed a listing of local service requests (LSRs) for submission through the processes defined in the Bulk Migration Process document. In developing the list of LSRs, BellSouth sampled one year's data of single migration requests to determine the breakdown of Unbundled Network Element-Port Loop Combination (UNE-P) Universal Service Order Codes (USOCs) that could be requested for transfer to Unbundled Network Element Loop (UNE-L) USOCs, according to the Bulk Migration Process. Based on this sample, BellSouth designed the UNE-P embedded base to meet the following statistical breakdown of eligible USOCs: Business (UEPBX)-10%, Residential (UEPRX)-85%, Coin (UEPCO)-3%, Business Remote Call Forwarding-1%, and Residential Remote Call Forwarding-1%. Next, BellSouth determined the statistical representation of UNE-L USOC migrations: UEAL2 – 94%, while UEAR2, UCLPW, UCL2W, UCL4W, UCL4O, UEQ2X, UAL2W, UHL2W, and UHL4W combined comprised 6%. UNE-P telephone numbers (TNs) were established based on the make-up of outside plant facilities within the state with approximately 50% on copper, 14% on Universal Digital Loop Carrier (UDLC), and 36% on Integrated Digital Loop Carrier (IDLC).

14. Numerous BellSouth employees were engaged to emulate the role of the Pseudo CLEC. Among the roles performed by the Pseudo CLEC were the administrative and operational roles associated with an actual CLEC.

Administrative Roles

15. The Pseudo CLEC created and submitted 724 Bulk Migrations. The submission process included interaction with a BellSouth Project Manager to assign due dates, submission of bulk LSRs through BellSouth electronic ordering gateways (i.e. TAG, LENS, and EDI), and the interaction with the BellSouth Local Carrier Service Center (LCSC), for processing of the orders and the interaction with the BellSouth Customer Wholesale Interconnection Network Services Center (CWINS) during the provisioning of the service orders. Service requests submitted by the Pseudo CLEC were processed through BellSouth's systems and service centers as normal transactions.

Operational Roles

16. The Pseudo CLEC completed a test that included 724 bulk migration lines processed in accordance with the Bulk Migration Process. The Pseudo CLEC also submitted 34 lines that were processed as single orders for Remote Call Forwarding (RCF) and 2 Wire Unbundled Copper Loop – Non Designed (UCL-ND). However, PwC's assessment included transactions submitted as Bulk Migrations and did not include the 34 RCF and UCL-ND lines. The Florida central offices included in the test were West Hollywood, Arch Creek, and Perrine.

17. The provisioning of the 724 lines included the central office and field technicians receiving the orders, installing the jumpers, performing a pre-cut dial tone and ANAC test,

performing the cutover, performing a post cut dial tone test, and informing the Pseudo CLEC or CWINS that the cut was completed.

18. Due to BellSouth acting as a Pseudo CLEC, without a CLEC switch, BellSouth did not send NPAC messages to officially port phone numbers and they did not include a billing verification for those charges that were incurred by the Pseudo CLEC.

19. The Pseudo CLEC was able to simulate the dial tone of a CLEC, for a Copper or UDLC Hot Cuts by wiring the BellSouth Originating Equipment (OE) block to the Pseudo CLEC block on the Distributing Frame. For copper and universal lines, the Pseudo CLEC half-tapped the jumper at the OE Block for each telephone number (TN) and connected a terminal pair on the Pseudo CLEC "CFA" block.

20. Due to BellSouth acting as the Pseudo CLEC, BellSouth had to deliver a dial tone from its own switch to its Pseudo CLEC CFA block. IDLC facilities have no physical appearance on the BellSouth frame. BellSouth established a second set of TNs that were wired to an OE block on the BellSouth frame then to the CLEC CFA block to simulate dial tone for the CLEC switch.

PwC Testing

21. PwC conducted testing for all 724 Bulk Migration service requests and did not select a sample.

22. In examining management's assertion that it has utilized its Bulk Migration Process to complete a test of Bulk Migration service requests for three central offices in Florida, PwC conducted numerous observations, validations, and re-performances pertaining to the responsibilities of the Pseudo CLEC and the responsibilities of the BellSouth Project

Manager (PM). PwC conducted the following examination steps relating to the PM and Pseudo CLEC:

- PwC observed the Pseudo CLEC's creation of project notifications.
- PwC obtained and examined emails used by the Pseudo CLEC for the project notification submission process.
- PwC observed the PM's process of validating project notifications and assigning them Bulk Order Package Identifiers (BOPI)s.
- PwC re-performed project manager validations on all project notifications.
- PwC observed and obtained communications pertaining to the rejection and resubmission process for project notifications.
- PwC obtained and examined email communication between the PM and the Workforce Management Center (WMC) for negotiation of due dates.
- PwC obtained and examined emails used by the PM to authorize the submission of BOPIs into the LNP Gateway by the Pseudo CLEC via TAG, EDI, or LENS.
- PwC observed and verified the submission of BOPIs into the LNP Gateway via TAG, EDI, or LENS by the Pseudo CLEC.
- PwC ensured that all orders requested were completed and communicated back to the Pseudo CLEC.
- PwC traced email communication and submission dates in order to test and verify that BellSouth operated under the timing restrictions specified in the Bulk Migration Process Document.
- PwC requested that the Pseudo CLEC submit Local Service Requests with inaccurate or incomplete data to validate BellSouth's edit/validation processes. PwC traced these

Local Service Requests and verified that the BellSouth Project Manager or electronic order systems identified the invalid transactions and rejected them.

23. In examining BellSouth management's assertion that it utilized its Bulk Migration Process to complete a test of Bulk Migration service requests for three central offices in Florida, PwC made numerous observations and completed testing pertaining to the responsibilities of the Local Carrier Service Center (LCSC). The LCSC is BellSouth's business office for all CLEC's. The LCSC receives and processes orders for LSRs. Among the observations PwC made:

- PwC obtained documentation showing that the Bulk Order Packages were processed for first and second level validations and that any rejects were clarified to the Pseudo CLEC.
- PwC obtained and reviewed Open Work Reports for the LCSC service representatives, and observed the representatives handle manual fallout of orders in LNP Gateway.
- PwC observed the representatives enter orders into DOE, EXACT or SOCS.
- PwC observed the representatives enter orders into the Local Order Numbering (LON) system. PwC obtained and reviewed printouts from LON which demonstrated that the representative performed the necessary work for orders requiring manual processing.
- PwC observed and obtained documentation for orders that were issued as supplemental.
- PwC observed LNP Gateway/LAUTO send a Firm Order Commitment (FOC) for each individual Purchase Order Number (PON). PwC obtained LNP Gateway printouts which demonstrated that the order had been FOC submitted and successfully sent to SOCS.

24. PwC observed BellSouth Central Office and Field Technicians and CWINS Service Representatives as they completed the bulk migration provisioning of 724 telephone numbers in 3 locations in Florida. Refer to Attachment B for a breakdown of the various services included in the Florida Bulk Migration Test. Our observations were completed at the following locations:

    - West Hollywood Central Office and 5 serving Field Office sites,
    - Arch Creek Central Office and 2 serving Field Office sites,
    - Perrine Central Office and 4 serving Field Office sites, and
    - CWINS Centers in Jacksonville and Atlanta.

25. PwC verified that the central office and field technicians received the service order, installed the jumper, performed the pre cut dial tone and ANAC, performed the cutover, performed a post-cut of the dial tone test, and notified the Pseudo CLEC or CWINS that the cut was completed as applicable.

26. In examining management's assertion that it utilized the Bulk Migration Process to complete a test of Bulk Migration service requests for three central offices in Florida, PwC made numerous observations pertaining to the responsibilities of the CWINS. The CWINS serves as the single point of contact for provisioning and maintenance of all unbundled network elements. PwC examined the BellSouth process for the CWINS for both the non-coordinated Hot Cuts and the coordinated Hot Cuts. The non-coordinated Hot Cuts are processed at the Atlanta CWINS center while the coordinated Hot Cuts are processed at the Jacksonville CWINS center.

    - For coordinated cuts, PwC obtained copies of the confirmation emails that the CWINS screening group received from the BellSouth Project Manager and verified that the

CWINS had received notification for each of the Bulk Order Packages that were submitted by the Pseudo CLEC via one of the electronic gateways (EDI, TAG, or LENS).

- For non-coordinated cuts, PwC obtained copies of the confirmation emails that the CWINS screening group received from the BellSouth Project Manager and verified that the CWINS had received notification for each of the Bulk Order Packages that were submitted by the Pseudo CLEC via one of the electronic ordering gateways (EDI, TAG, or LENS).
- PwC verified that all coordinated orders were properly transferred to the CWINS Provisioning Technician by tracing all orders that were submitted by the Pseudo CLEC via the electronic gateway (TAG, EDI, or LENS) through to the completion of the order.
- PwC observed that the CWINS Provisioning Technician contacted the Central Office Technician and Field Technicians for all coordinated test orders and verified that the technician completed the cutover.
- PwC verified through observation that the CWINS Provisioning Technician called the Pseudo CLEC within five minutes of completion for all coordinated cutovers.
- PwC observed the CWINS Provisioning Technician close all coordinated orders in WFA-C and SOCS and verified that the orders were closed through examining the WFA log files for each coordinated order.
- PwC observed the Maintenance Administrator (MA) conduct screening procedures to process non-coordinated orders.

- All bulk orders that are considered non-coordinated, must contain time interval criteria on the order in the WFAC system to be processed. PwC validated that all non-coordinated orders processed at the Atlanta CWINS contained the requisite criteria to be considered as non-coordinated orders. PwC reviewed each service order log to verify that each non-coordinated order contained the correct timing intervals and Field Identifiers (FIDs) to be recognized as a non-coordinated.
- PwC validated that MAs monitored the Atlanta CWINS fax machine to check for incoming "Go-Ahead" notifications from EnDI in order to ensure that the Atlanta CWINS abided by the respective worksteps published in the Bulk Migration Process for Non-Coordinated SL1 Orders.
- PwC validated and monitored that MAs also utilized the Go-Ahead Notification internal website to review orders earmarked for go-ahead notification to ensure that Atlanta CWINS personnel followed the requisite worksteps published in the Bulk Migration Process for Non-Coordinated SL1 Orders. PwC obtained hard copies of the EnDI faxes and verified that the Purchase Order Numbers (PON) and telephone numbers (TN) matched what were expected.
- PwC validated that MAs tested the phone lines for each non-coordinated order to verify that the non-coordinated order could be closed. This process is called the "open-in" test. PwC verified that the MAs validated the Frame Attendant's completed work by confirming that the MA retested the phone line to ensure that the cut was successful.
- PwC confirmed that the MAs generated and sent emails to the Pseudo CLEC to notify them of completion of the manual go-ahead. In addition to the EnDI fax, PwC obtained

copies of the manual go-ahead documents distributed from these emails. This documentation informs the Pseudo CLEC that migration completed.

- PwC verified that the Atlanta CWINS management contacted the applicable Workforce Management Center (WMC) contacts for orders that did not receive notification by 3:30 PM. PwC observed CWINS management contact the WMC via phone after 3:30PM to address orders without "go-ahead" notification. PwC observed that the WMC advised that the orders were eligible for "Go-Ahead" and PwC confirmed that the CWINS released the orders in MARCH and completed the orders in the WFA-C and SOCS systems respectively. For final verification and documentation, PwC obtained the EnDI fax and manual go-ahead documentation for these respective orders and verified that each manual go-ahead document corresponded to an EnDI fax.

27. Our examination included tracing 724 transactions through the Bulk Migration Process and noting exceptions with these transactions as they pertained to the Bulk Migration Process document. PwC defined control points throughout the Bulk Migration Process to account for all transactions. Among the control points that PwC established to ensure the integrity of the Bulk Migration Process were:

- PwC obtained copies of all Project Notifications submitted by the Pseudo CLEC to the Project Manager and compared those Project Notifications to all Bulk Order Package Identifiers (BOPIs).
- PwC obtained copies of emails demonstrating correspondence between the Pseudo CLEC and the BellSouth Project Manager for acceptance, rejection, and resubmission of PONS.

- PwC obtained copies of the BOPIs and compared those BOPIs to requests in the LNP Gateway / LAUTO systems. PwC obtained printouts for all the PONS entered into the LNP Gateway / LAUTO system by the Pseudo CLEC through either LENS, TAG, or EDI and verified the status (clarified, facilities check, FOC submitted) of each PON. From the LNP Gateway / LAUTO printouts. PwC verified that the PONS have passed both first and second level validation checks within LNP Gateway / LAUTO.
- PwC obtained copies of the PONS that were in LNP Gateway / LAUTO and traced them into the Service Order Communication System (SOCS). The FOC submitted status in LNP Gateway / LAUTO demonstrated that the Pseudo CLEC had a Firm Order Confirmation. PwC also obtained copies of the Open Work Reports which verified those LSRs which required manual intervention and compared those reports to the LON printouts that PwC obtained from the LCSC representatives. The LON system is used to send non-mechanized FOCs to CLECs.
- PwC obtained copies of the SOCS printouts and compared those printouts to the Switch / FOMS orders. The Switch / FOMS printout contains the engineering information (location of cable pair) that the frame attendant used to perform the hot cuts.
- PwC obtained copies of the EnDI faxes and emails and compared them to the BOPIs to demonstrate that all non-coordinated orders had been cut by BellSouth. EnDI faxes are received by the Atlanta CWINS for all non-coordinated cuts and EnDI emails are received by the Pseudo CLEC confirming that the non-coordinated cuts had been performed by BellSouth.
- PwC obtained the WFA logs for each service order processed during the Florida Bulk Migration Test. The WFA logs permit the tracking of the order status through the

BellSouth provisioning process. The WFA logs contain an audit trail of the work steps completed by Field Technicians, Central Office Technicians, CWINS Service Representatives and other WFA users.

- To gain an understanding of the security controls surrounding the Workforce Administration system, specifically, the WFA log, PwC inquired of BellSouth employees responsible for the operating system and application security for WFA. PwC obtained security settings for the WFA log and verified that the access rights are in place to prevent unauthorized changes.
- PwC obtained the WFA log for all service orders processed during the Bulk Migration Process test. PwC validated that the due date entries corresponded to expected results and that each service order had been closed within WFA.

Exceptions

28. PwC identified instances where BellSouth either deviated from their Bulk Migration Process or impacted customer service during the Hot Cut Process. PwC measured these instances against the criteria developed during the Engagement Planning process to assess their materiality. PwC identified the following issues as instances where BellSouth did not adhere to the Bulk Migration Process for a specific control point for at least 5% (conversely, adherence to the process was less than 95%) of the Bulk Migration Process local service request transactions:

- The Bulk Migration Process Document states that UCL-ND and RCF services can be submitted as Bulk Orders. However, BellSouth's electronic ordering systems will reject UCL-ND and RCF services if submitted on Bulk Migration orders. As such, PwC was not able to trace orders for the corresponding USOCs. Upon inquiry,

BellSouth Management stated that no UCL-ND or RCF Bulk Migration service requests had ever been received.

- While observing the process for the completion of bulk migration orders, PwC noted that EnDI emails were not received by the Pseudo CLEC for 49 non-coordinated lines. EnDI emails provide notification to the CLECs that the cutover has been completed. PwC noted that 47 of the lines where emails were not received were cutover on December 2, 2003. BellSouth indicated that a systems issue existed in sending the EnDI emails and had corrected this issue on December 3, 2003. No missing EnDI emails were reported on the December 4, 2003 and December 5, 2003 test days. PwC noted that two of the lines where emails were not received were cutover on December 11, 2003.

29. PwC identified the following issues as directly impacting customer service for a time period of greater than 15 minutes:

- While observing the BellSouth Bulk Migration Process test, PwC noted that the Central Office Technician was unable to ANAC the BellSouth dial tone upon commencing the Hot Cut Process for three lines. Once the Central Office Technician could not obtain a BellSouth dial tone, troubleshooting procedures were performed to resolve the issue. The BellSouth dial tone was restored by having the number downloaded to the switch translation tables. The elapsed time from the initial BellSouth dial tone check to the restoration of BellSouth dial tone was approximately 40 minutes for each line. The Field Office Technician then completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

- While observing the BellSouth Bulk Migration Process test, PwC noted that three cutovers were completed and dial tone could not be reestablished with 15 minutes. Once dial tone was reestablished the BellSouth Technician successfully verified CLEC dial tone and completed an ANAC test.
- While observing the BellSouth Bulk Migration Process test, PwC noted that for two orders the due dates were missed. Both orders were scheduled to be cutover on December 11, 2003. However, one of the two orders was cutover on December 5, 2003 and the other order was not cutover by December 11, 2003.

30. Certain instances were noted that did not meet the Bulk Migration Process 5% or customer impacting tolerance guidelines defined by PwC in the Engagement Planning process. However, based on the nature of the Hot Cut Process and the importance to all parties involved, these exceptions warranted reporting to provide greater transparency to all readers. The following issues have been deemed reportable by PwC:
    - While observing the BellSouth Bulk Migration Process test, PwC noted that the Field Office Technician was unable to ANAC the BellSouth dial tone for 19 lines prior to the cutover. The Field Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
    - While observing the BellSouth Bulk Migration Process test, PwC noted that for one order a Central Office Technician completed an ANAC on the BellSouth line prior to the cutover and received the wrong telephone number. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

- While observing the BellSouth Bulk Migration Process test at the Arch Creek central office on December 4, 2003, PwC noted that the frame attendant did not test for CLEC dial tone prior to performing the hot cut for 6 telephone numbers. The frame attendant verified the cutover was successfully completed via a dial tone and ANAC test subsequent to the cutover.

31. The following items were identified by PwC as instances where BellSouth deviated from their Bulk Migration Process, however these instances occurred less than 5% of the time and therefore were considered non-reportable:

- The Pseudo CLEC submitted a BOPI that did not meet the time interval requirements per the Bulk Migration Process Document. However, this BOPI was submitted electronically 14 days prior to the due date, which met the minimum time interval required for submission.
- PwC noted that they were unable to obtain two emails associated with the correspondence between the Pseudo CLEC and BellSouth. The emails were regarding the granting of authorization by the BellSouth Project Manager to the Pseudo CLEC to input two BOPIs into the electronic ordering gateways. Per discussion with the BellSouth Project Manager and Pseudo CLEC, the authorization was given verbally.
- While observing the BellSouth Bulk Migration Process test, PwC noted that one EnDI fax was not received by the Atlanta CWINS. The EnDI fax notifies the CWINS that the cutover has been completed.
- PwC noted that the Pseudo CLEC input Bulk Migration service requests prior to receiving the authorization to do so from the BellSouth Project Manager. PwC also noted that the BellSouth Project Manager was aware of the submission.

32. Our conclusion is included within our report dated December 18, 2003, which has been included as Attachment A.

Regional Test

33. In conjunction with Florida Bulk Migration testing, PwC verified whether the Hot Cut Process used by the central office and field technicians during BellSouth's test of its Bulk Migration Process was the same process used for non-bulk hot cuts in BellSouth's region according to the criteria defined within Management's assertion. As part of PwC's approach to verifying whether this process was the same, PwC viewed UNE-L non-bulk cuts across the BellSouth region.

Sample Size Determination for Regional Hot Cuts

34. PwC employed the following sampling techniques to determine the number of regional Hot Cuts to be tested across the BellSouth region:

- Total Population: > 300
- Confidence Factor: 95%
- Tolerable Rate: 5%
- Expected Error Rate: 1%

35. PwC loaded this criteria into Audit Command Language (ACL) and used the Sampling Size function to determine what sample size should be employed. Based on these criteria, our test population was identified to be 95 transactions.

36. PwC was unable to determine an exact population of future hot cuts due to the unpredictability of CLEC service orders. For purposes of identifying a sample size, PwC used a population of 1,000. Based on the other sample size criteria (i.e., confidence factor

of 95%, Tolerable Rate of 5% and Expected Error Rate of 1%), all populations that are greater than 300 will return a sample size of 95, therefore it is unnecessary to identify an exact population.

PwC Testing

37. From October 1, 2003 to December 18, 2003 PwC observed 96 Hot Cut service orders (which comprised of 179 telephone numbers) throughout BellSouth's region. Each week, BellSouth provided PricewaterhouseCoopers a listing of Coordinated Hot Cuts that were scheduled to be completed the following week. The lead times for Coordinated Hot Cuts are typically greater than Non-Coordinated Hot Cuts, which allowed for earlier notification of upcoming service orders. PwC also inquired of BellSouth when Non-Coordinated Hot Cuts were to be completed throughout the region. However, notice for Non-Coordinated Hot Cuts was given approximately two days in advance. Hot Cuts were viewed based upon the volume of CLEC activity in those states. Refer to Attachment C for details of the 96 Hot Cuts observed throughout BellSouth's region. PwC noted that sufficient Hot Cut order volume did not exist within Alabama and Kentucky; accordingly, we could not perform testing over the Hot Cut Process in those states.

38. PwC observed the following Hot Cuts as part of BellSouth's Bulk Migration Florida Test:

- December 2, 2003 – 124 Bulk Migration Hot Cuts in West Hollywood.
- December 4, 2003 – 119 Bulk Migration Hot Cuts in Arch Creek.
- December 5, 2003 – 108 Bulk Migration Cuts in Perrine.
- December 11, 2003 – 125 Bulk Migration Hot Cuts West Hollywood, 126 Bulk Migration Hot Cuts in Arch Creek, 122 Bulk Migration Hot Cuts in Perrine.

39. PwC observed the provisioning of the 96 Hot Cuts included in the Regional Test and the 724 Hot Cuts included in the Bulk Migration Process Test. The following processes were observed:

- PwC observed the Central Office and Field Technician receive the hot cut information associated with service orders via Work Force Administration – Dispatch (WFA-DI), Switch/FOMS, LMOS or IDS.
- PwC observed that the jumpers had been installed in accordance with the system instructions.
- PwC validated that Central Office continuity had been established by verifying the telephone number via an ANAC on the BellSouth jumper.
- PwC observed the Central Office Technician test for dial tone and Automatic Number Announcing Circuit (ANAC) on the CLEC pair and on the existing BellSouth pair. PwC validated that the telephone numbers were ANAC'd for the CLEC and BellSouth lines.
- PwC observed the cutover process performed by the Central Office Technician. PwC timed the total duration that the customer was without service. The timing began when the existing BellSouth pair was removed from the frame until the CLEC pair was punched into the frame. For any cutover that exceeded one minute, PwC noted the length of the duration the customer would have been without service.
- PwC observed the Central Office Technician test the cutover on the new CLEC cable pair to ensure dial tone had been restored and that the proper telephone number was received.

- PwC observed the workstep system closeout process performed by the Central Office Technician. PwC also obtained and examined the Switch/FOMS orders and the WFA logs and verified that the worksteps had been closed for each cutover.
- PwC obtained and examined the EnDI faxes received at the Atlanta CWINS facility for each to verify that each non-coordinated order was cut.

40. Specifically for Field Office Hot Cuts, PwC performed the following:

- PwC observed the field technician perform the electronic cross connect on the laptop. The electronic cross-connect was performed by entering the cable pair information: 1) the cable pairs migrating from 2) the cable pairs migrating to.
- PwC observed the Field Office Technician test for dial tone and ANAC on the CLEC pair and on the existing BellSouth pair at the Remote Terminal. PwC validated that the telephone numbers were ANAC'd for the CLEC and BellSouth lines.
- PwC observed the cutover process performed by the Field Office Technician. PwC timed the total duration the customer was without service. The timing began when the existing BellSouth pair was removed from the field terminal until the CLEC pair was connected into the field terminal. For any cutover that exceeded one minute, PwC noted the length of the duration the customer would have been without service.
- PwC observed the Field Office Technician test the cutover on the new CLEC cable pair to ensure dial tone had been restored and that the proper telephone number was returned via an ANAC test.
- PwC observed the workstep closeout process performed by the Field Office Technician in WFA-DO via Technet. PwC also obtained and examined the Switch/FOMS order and the WFA logs and verified that the worksteps had been closed for each cutover.

- PwC obtained and examined the standardized BellSouth Central Office Technician UNE-P to UNE-L SL1 and SL2 work instructions from each state in the BellSouth region. PwC also verified that the SL1 and SL2 work instructions in each BellSouth state were consistent.
- PwC obtained the EnDI faxes from the CWINS which notifies them that the CLEC's line was cut for non-coordinated cuts.
- PwC observed the CO and Field Technicians inform the CWINS that the CLEC's line was cut for coordinated cuts.

Exceptions

41. PwC noted that six exceptions identified during the Bulk Migration Process Test, directly related to the physical Hot Cut provisioning process included in the Regional Test, noted below, and have been reported in our exceptions noted during the Bulk Migration Test.
    - While observing the BellSouth Bulk Migration Process test, PwC noted that the Central Office Technician was unable to ANAC the BellSouth dial tone upon commencing the Hot Cut Process for three lines. Once the Central Office Technician could not obtain a BellSouth dial tone, he began troubleshooting the issue. The BellSouth dial tone was restored by having the number downloaded to the switch translation tables. The elapsed time from the initial BellSouth dial tone check to the restoration of BellSouth dial tone was approximately 40 minutes for each line. The Field Office Technician then completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

- PwC noted that three cutovers were completed and dial tone could not be reestablished with 15 minutes. Once dial tone was reestablished the BellSouth Technician successfully verified CLEC dial tone and completed an ANAC test.
- While observing the BellSouth Bulk Migration Process test, PwC noted that for two orders the due dates were missed. Both orders were scheduled to be cutover on December 11, 2003. However, one of the two orders was cutover on December 5, 2003 and the other order was not cutover by December 11, 2003.
- While observing the BellSouth Bulk Migration Process test, PwC noted that the Field Office Technician was unable to ANAC the BellSouth dial tone for 19 lines prior to the cutover. The Field Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
- While observing the BellSouth Bulk Migration Process test, PwC noted that for one order that a Central Office Technician completed an ANAC on the BellSouth line prior to the cutover and received the wrong telephone number. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.
- PwC noted that while observing the cutover process for the 125 hot cuts at the Arch Creek central office on December 4, 2003, PwC noted that the frame attendant did not test for CLEC dial tone prior to performing the hot cut for 6 telephone numbers. The frame attendant verified the cutover was successfully completed via a dial tone and ANAC test subsequent to the cutover.

42. PwC identified instances where BellSouth either deviated from their Hot Cut Process or impacted customer service during the Hot Cut Process. PwC measured these instances

against the criteria developed during the Engagement Planning process to assess whether they are reportable. PwC identified the following issues as instances where BellSouth did not adhere to the Hot Cut Process for a specific control point for at least 5% (conversely, adherence to the process was less than 95%) of the Hot Cut Process:

- While observing Hot Cuts across BellSouth's region, we noted that the central office technician did not perform a pre-cut dial tone and ANAC test for the BellSouth and CLEC lines prior to performing the hot cut for seven telephone numbers. We noted that the central office technician did not perform a pre-cut dial tone and ANAC test on the CLEC line prior to performing the hot cut for two additional telephone numbers. We also noted that the BellSouth Technician completed each cutover and successfully verified CLEC dial tone and completed an ANAC test.
- While observing Hot Cuts across BellSouth's region test, we noted that the Central Office Technician was unable to ANAC the BellSouth dial tone for one line prior to the cutover. The Central Office Technician completed the cutover and successfully verified CLEC dial tone and completed an ANAC test.

43. PwC identified the following issues as directly impacting customer service for a time period of greater than 15 minutes:

- While observing Hot Cuts across BellSouth's region, we noted that a cutover was completed despite a service order in a Missed Appointment status. Due to the service order being in a Missed Appointment status, an EnDI fax was not sent to the CWINS center.

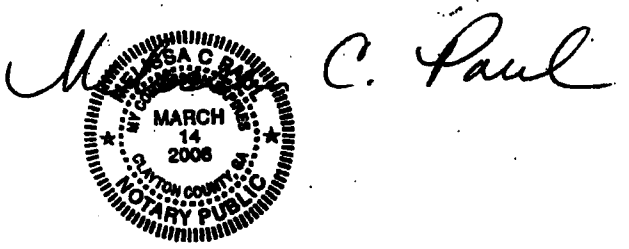
44. Our conclusion is included within our report dated December 18, 2003, which has been included as Attachment A.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on December 23, 2003

Paul M. Gaynor
Principal, PricewaterhouseCoopers LLP

Subscribed and sworn to before me this 23rd day of December 2003.



Attachment A

(Our reports dated December 18, 2003 with BellSouth Assertions in PDF)

Attachment B

Florida Bulk Migration Cutover Statistics by Quantity and Percentage

Total Orders for the BellSouth Bulk Migration Testing by Field Office & Central Office					
Central Offices in South Florida					
[illegible]					
West Hollywood	17	5	99	3	124
[illegible]					
Arch Creek	9	12	83	15	119
[illegible]					
Perrine	0	37	38	33	108
[illegible]					
West Hollywood	17	4	94	10	125
Arch Creek	4	21	40	61	126
Perrine	9	10	21	82	122
Totals	**56**	**89**	**375**	**204**	**724**

[illegible]					
West Hollywood	2.35%	0.69%	13.67%	0.41%	17.13%
[illegible]					
Arch Creek	1.24%	1.66%	11.46%	2.07%	16.44%
[illegible]					
Perrine	0.00%	5.11%	5.25%	4.56%	14.92%
[illegible]					
West Hollywood	2.35%	0.55%	12.98%	1.38%	17.27%
Arch Creek	0.55%	2.90%	5.52%	8.43%	17.40%
Perrine	1.24%	1.38%	2.90%	11.33%	16.85%
Totals	**7.73%**	**12.29%**	**51.80%**	**28.18%**	**100.00%**

Attachment C

Regional Hot Cut Cutover Statistics

Total Orders for the Regional Hot Cut Testing by State		
State	**Orders Viewed**	**Lines Viewed**
Alabama	1	1
Florida	33	46
Georgia	25	54
Kentucky	0	0
Louisiana	7	17
Mississippi	3	4
North Carolina	17	40
South Carolina	4	6
Tennessee	6	11
Totals	**96**	**179**

Orders Viewed	71	25	96	86	10	96
Lines Viewed	154	25	179	151	28	179

WC Docket No. 04-313
CC Docket No. 01-338

Ainsworth, Milner and Varner Affidavit

Exhibit BLS - 7

First Assertion, Deviation 1—this deviation resulted when the BellSouth technician could not ANAC the BellSouth dial tone prior to the cut for 3 of the 724 bulk migrations. After investigating and resolving the issue, which took approximately 40 minutes for each dial tone, the technician was able to restore the dial tone through the BellSouth switch. The hot cut was then successfully completed. Although both BellSouth and CLECs strive for perfection, occasionally there may be an issue with the dial tone from either switch on the day of the hot cut. Therefore, it is imperative that BellSouth have procedures in place to resolve these types of issues. These three cuts demonstrate that BellSouth does have the procedures and ability to resolve issues, and complete successful migrations. PwC listed this as a category 2 deviation where customer service was impacted for over 15 minutes.

First Assertion, Deviation 2—this deviation resulted after PwC observed 3 of the 724 bulk migrations that took longer then 15 minutes. There was one hot cut that took 20 minutes while two other hot cuts took approximately 40 minutes. In these cases, the BellSouth field technician encountered and resolved an issue involving an electronic cross-connect in a remote terminal. This situation extended the hot cut's completion time by a few minutes. PwC listed this as a category 2 deviation where customer service was impacted for over 15 minutes.

First Assertion, Deviation 3—there were 2 of the 724 bulk migrations where BellSouth technicians failed to successfully complete hot cuts. In the first case, BellSouth performed the migration prior to the due date so the end user customer would have been able to make calls, but not receive calls. The second case resulted from the migration not being performed on the due date. In this case, the end user customer could have potentially lost service. BellSouth has a thorough process that provides for contingencies to ensure that the risk of interruption of service to the customer is minimized, but

occasionally failures do occur as demonstrated in the test. PwC listed this as a category 2 deviation where customer service was impacted for over 15 minutes.

These first three deviations constitute PwC findings for the impact to customer service that exceeded 15 minutes. There were a total of 8 instances during the 724 bulk migrations. This genesis of this 15 minute benchmark is the SQM measure on the timeliness of coordinated conversions where this Commission has established a benchmark of 95% within 15 minutes. Thus, BellSouth's performance during the test translates to 98.9% which exceeds the Commissions benchmark.

First Assertion, Deviation 4—this deviation resulted when BellSouth field technicians were completing IDLC conversions in a field remote terminal. The technician was unable to ANAC the BellSouth dial tone for 19 lines. This issue or deviation was an artifact of the test resulting from the two TNs needed for all IDLC served UNE-Ps. In live customer conversions, only one TN is involved, thus this situation would not have occurred. This deviation did not have any negative impact to the migration; the 19 hot cuts were still successfully completed within the allotted 15 minute time period. PwC listed this as a category 3 deviation where the issue would not be considered reportable via the first two threshold categories, but PwC elected to report the issue as a deviation to ensure that it was visible to the reader.

First Assertion, Deviation 5—this deviation resulted when the central office technician did not completely follow the process for one of the 724 bulk hot cuts. In this case, the technician found that the BellSouth jumper wire had the wrong TN, but the CLEC jumper wire had the correct TN. The technician should have contacted the CWINS center which would have contacted the CLEC to confirm the TN and to get the CLEC's permission to proceed with the cut. These contacts did not occur. In the end, the hot cut was

successfully made with the correct TN, but the deviation was noted due to a process step miss. PwC listed this as a category 3 deviation where the issue would not be considered reportable via the first two threshold categories, but PwC elected to report the issue as a deviation to ensure that it was visible to the reader.

First Assertion, Deviation 6—this deviation resulted when PwC observed a total of 6 instances in which BellSouth technicians missed a hot cut process step. More specifically, on Day 2 of the test, PwC observed that the BellSouth technician neglected to test the CLEC dial tone prior to performing the hot cut for 6 telephone numbers. These were certainly process step omissions; however, the process contains several safeguards to ensure that the hot cuts are successfully executed. That was the case on these 6 observations; these inadvertent step omissions did not negatively impact the ultimate success of all 6 of the conversions. PwC listed this as a category 3 deviation where the issue would not be considered reportable via the first two threshold categories, but PwC elected to report the issue as a deviation to ensure that it was visible to the reader.

First Assertion, Deviation 7—this deviation resulted when a minor system issue was identified during the test while submitting bulk LSRs. The issue is not considered material since no CLEC has actually bulk ordered the associated products. The Bulk Migration test included an evaluation of the electronic LSR submission process. Using this process, the pseudo- CLEC successfully submitted LSRs resulting in BellSouth's ordering systems generating 724 bulk migrations. There are two circumstances under which a bulk LSR can not be submitted into BellSouth's ordering systems. The first circumstance involves the bulk migration to a UNE-L service known as a non-designed 2-Wire Unbundled Copper Loop or UCL-ND. The second circumstance involves the bulk migration of Remote Call Forwarding UNE-P services. BellSouth can in fact

perform migrations for both of these service types via single migration, however the Universal Service Order Codes ("USOCs") associated with these products cannot be submitted on bulk LSRs. If a CLEC needed to order the migration of either of these products, it would simply submit single LSRs. It should be emphasized that these two products constitute less than 2% of the service types within BellSouth's embedded base services. Therefore, this particular issue would have minimal impact on CLEC customers and is not material to BellSouth's overall ability to successfully perform bulk migrations of services commonly used by CLECs. BellSouth has targeted the UCL-ND issue correction to occur in Release 15.0 in March of 2004, while the RCF issue is currently under investigation. RCF is a unique product that does not have an actual loop in the service. BellSouth is considering the removal of this product from the Bulk Migration Process since it is targeted for the migration of services that involve loops. Once again, it is important to put the magnitude of this system issue into context particularly since no CLECs have attempted to bulk order migrate these two service types. PwC listed this as a category 1 deviation where adherence to the process did not occur at least 95% of the time. If you consider the embedded base of these products and the fact that no CLEC has ever ordered the products via the Bulk Migration Process, clearly there is no material impact to operational CLECs.

First Assertion, Deviation 8—this deviation resulted due to poor performance observed on the first day of testing with BellSouth's Enhanced Delivery Initiative ("ENDI") system. For non-coordinated hot cuts, this system sends an electronic notification (commonly called a "go ahead") to inform the CLEC that BellSouth has completed the hot cut. This notification is the signal for the CLEC to begin their porting process with NPAC. During the first day of testing, ENDI experienced an issue with a corrupt downstream server. There were two servers that should have been submitting the notices

to the pseudo CLEC. The corrupted server was not sending messages, thus the failure occurred and the deviation was noted. BellSouth corrected the server problem on December 3, 2003. As is evidenced by PwC's observations, the system was fixed and no failures were observed on the second and third days of testing. There was one notice for a two line service order that was not submitted on day four of testing. This failure resulted from an issue of completing the work order step in ENDI which prevented the notice from being submitted. The problem was identified and corrected as evidenced by the test results on the second, third and fourth days of testing. PwC listed this as a category 1 deviation where adherence to the process did not occur at least 95% of the time. When considering the first day of testing, BellSouth failed to return 47 of the 124 bulk migration notifications. However, once the server problem was corrected, BellSouth successfully submitted 119 notices on the second day, 108 notices on the third day and 371 notices on the fourth day of testing. In other words, BellSouth's performance was 99.7% after the issue was resolved from the first day of testing.

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Second Assertion, Deviation 7—this deviation resulted from simple process step omission that ultimately had no direct impact on the success of the hot cut. PwC found a total of 9 occasions in which BellSouth technicians inadvertently omitted either a CLEC or BellSouth pre-hot cut verification step. It is important to note that the observed process step omissions were not a regionality issue; they were simply issues of BellSouth technicians not completely following the same hot cut process that is used across the BellSouth region. In spite of the omitted step, all 9 hot cuts resulted in successful conversions. PwC listed this as a category 1 deviation where adherence to the process did not occur at least 95% of the time.

Second assertion, Deviation 8—this deviation resulted when there was no BellSouth dial tone on the day of the cut for one of the 179 hot cuts. In this case, instead of attempting to restore dial tone on the BellSouth side of the cut, the technician elected to go ahead with the hot cut. The cut was successfully made, and the CLEC accepted the migration when contacted by the CWINS center. As stated previously, no dial tone conditions infrequently occur; however, when it does, BellSouth has procedures in place to resolve these types of issues and complete a successful migration. PwC listed this as a category 1 deviation where adherence to the process did not occur at least 95% of the time.

Second Assertion, Deviation 9—this deviation was noted after an attempt to resolve a CLEC issue on one of the 179 hot cuts. When the BellSouth technician began the hot cut process on the due date, there was no CLEC dial tone so the technician correctly put the order in a missed appointment status that returns the responsibility back to the CLEC to resolve the missing dial tone issue. On the next day, there was an additional hot cut being observed by the same PwC tester. While the PwC tester was in the central office, the BellSouth technician checked on the hot cut from the previous day. The CLEC had

corrected their dial tone problem, so the technician completed the hot cut. However, the technician should not have made the cut since the service order was still in a missed appointment status, thus the hot cut process was not correctly followed so this observation was listed as a deviation. To further complicate the story, the CLEC had actually ported the TN on the day prior to the due date of the hot cut. The bottom line is that the customer could make calls, but could not receive any calls for two days and it would have been longer if the BellSouth technician had not violated the process and completed the hot cut. PwC listed this as a category 2 deviation where customer service was impacted for over 15 minutes.

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Exhibit BLS - 9

	Provisioning					
	Coordinated Customer Conversion Interval					
	(%of Coordinated Time Intervals Worked to Cutover Loops (BST-CLEC) within 15 minutes)					
	Numerator indicates total number of coordinated loop cutovers performed within 15 min for this disaggregation in the					
	Volume indicates total number of items cut for this disaggregation in the reporting period.					
Month	State	Product Group Description	Interval	CLEC Numerator	CLEC Volume	CLEC Metric
December 2002	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	3,347	3,353	99.82%
January 2003	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	2,892	2,904	99.59%
February 2003	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	2,667	2,674	99.74%
March 2003	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	3,066	3,079	99.58%
April 2003	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	3,425	3,432	99.80%
May 2003	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	3,310	3,318	99.76%
June 2003	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	3,162	3,163	99.97%
July 2003	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	3,772	3,794	99.42%
August 2003	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	3,692	3,698	99.84%
September 2003	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	3,549	3,563	99.61%
October 2003	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	4,272	4,286	99.67%
November 2003	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	2841	2846	99.82%
December 2003	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	2340	2353	99.45%
January 2004	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	1892	1897	99.74%
February 2004	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	2017	2017	100.00%
March 2004	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	2084	2085	99.95%
April 2004	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	1617	1621	99.75%
May 2004	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	1644	1649	99.70%
June 2004	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	1623	1625	99.88%
July 2004	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	1374	1386	99.13%
Average	Region	Local Number Portability (LNP/INP) - Loop	>= 95% w in 15 min	54,586	54,743	99.71%

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Exhibit BLS - 10

Hot cut work load calculation

UNE-P growth per month = 116,295
UNE-L growth per month = 19,029

October 2003
UNE-Ps in service = 2.21M.
Continue UNE-P growth
For 9 months
Hot cuts per month = 19,029
(Note 1)

July 2004
UNE-Ps in service = 3.26M
PSC Decision
Continue UNE-P growth
For 5 months
Hot cuts per month = 19,029
(Note 1)

December 2004
UNE-Ps in service = 3.84M
No new UNE-Ps. All growth
Becomes UNE-L
For 8 months
Hot cuts per month = 135,324
(Note 2)

August 2005
UNE-Ps in service = 4.77M
Convert 1/3 of UNE-Ps to UNEL.
Handle UNE-L growth
For 7 months
Hot cuts per month = 317,998
(Note 3)

March 2006
UNE-Ps in service = 2.22M
Convert 1/3 of UNE-Ps to UNE-L.
Handle UNE-L growth
For 7 months
Hot cuts per month = 317,998
(Note 3)

October 2006
UNE-Ps in service = 1.11M
Convert 1/3 of UNE-Ps to UNE-L.
Handle UNE-L growth
For 7 months
Hot cuts per month= 317,998
(Note 3)

May 2007
UNE-Ps in service = 0
Handle UNE-L growth
Going forward
Hot cuts per month = 135,234
(Note 4)

Note 1: Only stand-alone UNE-L requests require a hot cut. (19,029)
Note 2: Sum of stand-alone UNE-L requests plus UNE-P growth requires a hot cut. (19,029 + 116,295 = 135,324)
Note 3: Sum of stand-alone UNE-L requests plus UNE-P growth plus attrition of UNE-P embedded base requires a hot cut. (19,029 + 116,295 + ((3.84M * 0.333)/7) = 317,998.
Note 4: Sum of UNE-L growth and UNE-P growth requires a hot cut. (19,029 + 116,295 = 135,324)

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Exhibit BLS - 11

Top 20 Florida Wire Centers List

Worst Case Force Projection

ercentage of UNEPs that will convert to UNEL	100%
Business days per month	22.3
Regional growth UNEPs per month	118,295
Regional IM UNELs per month	19,928
Churn percentage per month	4%
Maintenance and Repair Report Rate increase per month	6%

Daily Conversion % to SL1 Non-Coordinated	50.00%
Daily Conversion % to SL1 Coordinated	25.00%
Daily Conversion % to SL2 (Coordinated)	25.00%

CO Cutover Times (Hours)	First Line (Worst Case)	Additional Line
CO Time SL1 Non Coordinated	0.43333	0.30000
CO Time SL1 Coordinated	0.60000	0.33333
CO Time SL2 (Coordinated)	1.05000	0.63333
Outside Tech Cutover Hours per Dispatch	1.0000	

STATE	W/C	I&M Work Center	% of Total UNE-Pa	% IDLC	UNE-P Growth per Month	UNE-L Growth per Month	Total UNE-P Dec. 2004	No new UNEP. Only new UNE-L. Monthly UNE-P to UNE-L Conversions plus Normal UNE-P and UNE-L Growth	Daily UNE-P to UNE-L Conversions	Daily Conversions Requiring Outside Dispatch	Daily Conversions to SL1 Non-Coordinated	Daily Conversions to SL1 Coordinated	Daily Conversions to SL2 (Coordinated)	CO Transfer Man-Hours	Outside Transfer Man-Hours
FL	hlwdlpe	81 NW 98 AVE/ 1390	1.25174%	82%	1,456	238	48,042	3,979	196	161	97	49	49	122.60	160.57
FL	miamlfhl	13305 NW 45 AVENU	0.81674%	51%	950	155	31,347	2,598	127	64	64	32	32	80.00	64.44
FL	hlwdlwh	250 SW 62 AVE.	0.81249%	21%	945	155	31,183	2,583	126	27	63	32	32	79.58	26.96
FL	pmnlfma	10330 SW 184 St., F	0.68049%	47%	791	129	26,117	2,163	108	50	53	26	26	66.65	49.83
FL	pmbhfics	9500 Royal Palm Blvd	0.54365%	56%	632	103	20,865	1,728	85	47	42	21	21	53.25	47.15
FL	wpbhfga	1201 Barnett Dr, Lake	0.53082%	51%	617	101	20,365	1,687	83	42	41	21	21	51.97	42.45
FL	miamfica	12800 SW 56 St. Miar	0.52982%	46%	616	101	20,327	1,684	82	38	41	21	21	51.87	38.07
FL	ftldlfoa	4200 W. Oakland Pk.	0.50891%	14%	590	96	19,455	1,611	79	11	39	20	20	49.85	11.26
FL	pmbhfima	1180 Banks Rd., Marg	0.48107%	37%	559	92	18,463	1,529	75	28	37	19	19	47.12	28.04
FL	ndadfbr	19051 N.E 3RD CT.	0.46745%	42%	544	89	17,941	1,486	73	31	36	18	18	45.78	30.64
FL	orldlfph	5120 SilverStar Road	0.42568%	63%	496	81	16,339	1,353	66	42	33	17	17	41.69	41.78
FL	ftldlfpl	4401 DAVIE BLVD.-F	0.42563%	27%	495	81	16,336	1,353	66	18	33	17	17	41.69	18.03
FL	miamfwd	12800 SW 56 St. Miar	0.40857%	55%	476	78	15,719	1,302	64	35	32	16	16	40.12	35.05
FL	ftldlfja	10141 W. BROWARD	0.40898%	54%	476	78	15,697	1,300	64	34	32	16	16	40.08	34.26
FL	ndadfac	19051 N.E 3RD CT.	0.40441%	8%	470	77	15,521	1,285	63	5	31	16	16	39.61	5.02
FL	bybhfima	321 SE 2nd St, Delray	0.40333%	56%	469	77	15,480	1,282	63	35	31	16	16	39.50	34.85
FL	pmbhflfe	1117 NE 3rd Ave., Fo	0.37418%	21%	435	71	14,361	1,190	58	12	29	15	15	36.65	12.26
FL	hlwdlfma	715 N. FEDERAL HW	0.37360%	17%	434	71	14,339	1,188	58	10	29	15	15	36.59	9.86
FL	ftldlfmr	201 S.W. 14 STREET	0.36581%	17%	425	70	14,040	1,163	57	10	28	14	14	35.83	9.83
FL	ndadfgg	19051 N.E 3RD CT.	0.35925%	13%	418	68	13,788	1,142	56	7	28	14	14	35.19	7.21
FL	miamfpl	9090 NW 41 Street	0.35251%	62%	410	67	13,529	1,121	55	34	27	14	14	34.53	33.83
FL	miamfish	8451 NE AVE	0.35043%	0%	408	67	13,449	1,114	55	0	27	14	14	34.32	0.04
FL	bcrtfima	6037 W. Atlantic Ave,	0.34848%	39%	405	66	13,375	1,108	54	21	27	14	14	34.13	21.34
Florida Total			28.86347%	36%	33,564	5,492	1,107,743	91,755	4,493	1,620	2,247	1,123	1,123	2,827	1,620

Headcount	377	216
Add Undistributed	452	259
Supervisors 15/1	30	17
Total Force	759	

Florida Only

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Exhibit BLS - 12

BELLSOUTH®

Kentucky
TRO Measures

WC Docket No. 04-313
Exhibit BLS-12

Issue Date: September 24, 2004

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WC Docket No. 04-313
Exhibit BLS-12
Contents

Kentucky TRO Measures

Contents

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BMRT: UNE Bulk Migration - Response Time

Definition

This report measures the average interval and percent within the interval from the submission of a UNE Bulk Migration Notification Form to the distribution of Bulk Notification Form, including negotiated due date back to the CLEC.

Exclusions

- Projects not identified as UNE Bulk Migration
- Weekends and Holidays
- Canceled Requests

Business Rules

The CLEC Bulk Migration process includes the submission of a Bulk Migration Notification Form to BellSouth via email. The project manager negotiates due date, assigns Bulk Order Package Identification (BOPI) number, and validates related PONs in the Bulk package. BellSouth then returns the Bulk Notification Form, including negotiated due date to the CLEC.

The "Receive Date" is defined as the date the Bulk Migration Notification Form is received by the BellSouth Project Manager via email. It is counted as day zero. Bulk Migration "Return Date" is defined as the date BellSouth returns a response. The interval calculation is reset to zero when a CLEC initiated change occurs on the Bulk Migration Notification Form.

This measurement combines three sub-metrics:

1. From receipt of a valid Bulk Migration Notification Form (up to 99 individual telephone numbers) to the return of the Bulk Notification Form, including negotiated due date, back to the CLEC.
2. From receipt of a valid Bulk Migration Notification Form (100 up to 200 individual telephone numbers) to the return of the Bulk Notification Form, including negotiated due date, back to the CLEC.
3. From receipt of a valid Bulk Migration Notification Form (201 or more individual telephone numbers) to the return of the Bulk Notification Form, including negotiated due date, back to the CLEC.

Calculation

Response Interval = (a - b)

- a = Date BellSouth returns a response
- b = Date the Bulk Migration Notification Form is received

Average Interval = (c / d)

- c = Sum of all response intervals
- d = Total number of Bulk Migration Notification Forms received within the reporting period

Percent within Interval = (e / f) X 100

- e = Total Bulk Migration Notification Forms received within the interval
- f = Total number of Bulk Migration Notification Forms processed within the reporting period

Report Structure

- CLEC Aggregate
- CLEC Specific
- Geographic Scope
  - State
- Intervals for manual Bulk Migration Notification Forms:
  0 - <= 99 individual telephone numbers
  - 0 – <= 4 Business days
  - > 4 Business days
  100 - <= 200 individual telephone numbers

- 0 - <= 6 Business days
- > 6 Business days

>= 201 individual telephone numbers

- Average Interval in days

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• 0 - <= 99 individual telephone numbers	Benchmark: 95% <= 4 Business Days
• 100 - <= 200 individual telephone numbers	Benchmark: 95% <= 6 Business Days
• >= 201 individual telephone numbers	Benchmark: Diagnostic

SEEM Measure

SEEM	Tier I	Tier II
No		

RI: Reject Interval

Definition

The interval for the return of a reject is the response time from the receipt of a service request [Local Service Request (LSR) or Access Service Request (ASR)] to the distribution of a reject.

Exclusions

- Service requests canceled by CLEC prior to being rejected/clarified
- Fatal Rejects
- LSRs identified as "Projects" with the exception of valid "Project IDs" for UNE-P to UNE Loop Bulk Migration
- Scheduled OSS Maintenance
- Test Transaction/Records

Business Rules

Service Requests are considered valid when submitted by the CLEC and pass edit checks to ensure the data received is correctly formatted and complete. When there are multiple rejects on a single LSR, the first reject issued is used for the calculation of the interval duration.

Fully Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) until the LSR is rejected (date and time stamp of reject in ordering interface gateways). Auto Clarifications are considered in the Fully Mechanized category.

Partially Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) which falls out for manual handling until the LCSC Service Representative clarifies the LSR back to the CLEC via ordering interface gateways.

Non-Mechanized: The elapsed time from receipt of a valid LSR not submitted via electronic ordering systems (date and time stamp of FAX or date and time paper LSRs are received in the LCSC) until notice of the reject (clarification) is returned to the CLEC via FAX Server.

Local Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Carrier Interconnection Switching Center (CISC).

Only normal business hours will be included in the interval calculation for this measure. The interval will be the amount of time accrued from receipt of the LSR/ASR until normal closing of the center, if an LSR/ASR is worked using overtime hours. In the case of a partially mechanized LSR/ASR received and worked outside normal business hours, the interval will be set at one (1) minute. The hours of operation can be found on the Interconnection website (http://www.interconnection.bellsouth.com/centers).

Bulk Migrations: Requests for Bulk Migrations will come into BellSouth via a Global Request. The Global Request will be broken down into individual LSRs. These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure. For the interval calculations, the original versions of the individual LSRs will be assigned the "start time-stamp" from the receipt of the original Global Request.

Calculation

Reject Interval = (a - b)

- a = Date and time of service request rejection
- b = Date and time of service request receipt

Percent within Interval = (c / d) X 100

- c = Service requests rejected in reported interval
- d = Total service requests rejected in report period

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WC Docket No. 04313
Ainsworth/Milner Exhibit BLS-13
Ordering

Kentucky TRO Measures

Report Structure

One report with the following four Disaggregation Levels and their associated interval buckets:

- Fully Mechanized:
  0 - <= 1 hour
- Partially Mechanized:
  0 - <= 10 hours
- Non-Mechanized:
  0 - <= 18 hours
- Local Interconnection Trunks:
  0 - <= 4 days
- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Fully Mechanized	97% <= 1 Hour
• Partially Mechanized	90% <= 10 Hours
• Non-Mechanized	85% <= 18 Hours
• Local Interconnection Trunks	85% <= 4 Days

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

RI: Reject Interval

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FOCT: Firm Order Confirmation Timeliness

Definition

The interval for return of a Firm Order Confirmation (FOC) is the response time from the receipt of a valid Access Service Request (ASR)/Local Service Request (LSR) to distribution of a FOC.

Exclusions

- Service Requests canceled by CLEC prior to a FOC being returned
- Designated Holidays are excluded from the interval calculation for partially mechanized and non-mechanized LSRs/ASRs only
- LSRs identified as "Projects" with the exception of valid "Projects IDs" for UNE-P to UNE Loop Bulk Migrations
- Test Transactions/Records
- Scheduled OSS Maintenance

Business Rules

When multiple FOCs occur on a single LSR/ASR, the first FOC is used to measure the interval.

Fully Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) until the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC via ordering interface gateways.

Partially Mechanized: The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in ordering interface gateways) which falls out for manual handling until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is returned to the CLEC via ordering interface gateways.

Non-Mechanized: The elapsed time from receipt of a valid paper LSR not submitted via electronic systems (date and time stamp of FAX or date and time paper LSRs received in LCSC) until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is sent to the CLEC via FAX Server.

Local Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Carrier Interconnection Switching Center (CISC).

Only normal business hours will be included in the interval calculation for this measure. The interval will be the amount of time accrued from receipt of the LSR/ASR until normal closing of the center, if an LSR/ASR is worked using overtime hours. In the case of a partially mechanized LSR/ASR received and worked outside normal business hours, the interval will be set at one (1) minute. The hours of operation can be found on the Interconnection website (http://www.interconnection.bellsouth.com/centers).

Bulk Migrations: Requests for Bulk Migrations will come into BellSouth via a Global Request. The Global Request will be broken down into individual LSRs. These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure. For the interval calculations, the original versions of the individual LSRs will be assigned the "start time-stamp" from the receipt of the original Global Request.

Calculation

Firm Order Confirmation Interval = (a - b)

- a = Date and time of Firm Order Confirmation
- b = Date and time of service request receipt

Percent within Interval = (c / d) X 100

- c = Service requests confirmed in reported interval
- d = Total service requests confirmed in the report period

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Report Structure

One report with the following four Disaggregation Levels and their associated interval buckets:

- Fully Mechanized:
  0 - <= 3 hours
- Partially Mechanized:
  0 - <= 10 hours
- Non-mechanized:
  0 - <= 24 hours
- Local Interconnection Trunks:
  0 - <= 10 days
- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Fully Mechanized	95% <= 3 Hours
• Partially Mechanized	90% <= 10 Hours
• Non-Mechanized	90% <= 24 Hours
• Local Interconnection Trunks	95% <= 10 Days

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

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FOCRC: Firm Order Confirmation and Reject Response Completeness

Definition

This measurement provides the percent of Local Service Requests (LSRs)/Access Service Requests (ASRs) received during the reporting period that are responded to with either a reject or firm order confirmation.

Exclusions

- Service requests canceled by the CLEC prior to FOC or Reject being sent
- Fatal Rejects
- LSRs identified as "Projects" with the exception of valid "Projects IDs" for UNE-P to UNE Loop Bulk Migrations
- Test Transactions/Records

Business Rules

Fully Mechanized: The number of FOCs or Rejects sent to the CLEC from ordering interface gateways in response to electronically submitted LSRs (date and time stamp in ordering interface gateways).

Partially Mechanized: The number of FOCs or Rejects sent to the CLEC from ordering interface gateways in response to electronically submitted LSRs (date and time stamp in ordering interface gateways), which fall out for manual handling by the LCSC personnel.

Non-Mechanized: The number of FOCs or Rejects sent to the CLECs via FAX Server in response to manually submitted LSRs/ASRs (date and time stamp in FAX Server).

Local Interconnection Trunks: Interconnection Trunks are ordered on Access Service Requests (ASRs). ASRs are submitted to and processed by the Carrier Interconnection Switching Center (CISC).

Bulk Migrations: Requests for Bulk Migrations will come into BellSouth via Global Requests. The Global Request will be broken down into individual LSRs. These individual LSRs will be used for the measurements and will be reported within the correct product disaggregation for each measure.

Calculation

Firm Order Confirmation/Reject Response Completeness = (a / b) X 100

- a = Total number of service requests for which a Firm Order Confirmation or Reject is sent
- b = Total number of service requests received in the report period

Report Structure

- One report with the following four Disaggregation Levels:
  - Fully Mechanized
  - Partially Mechanized
  - Non-Mechanized
  - Local Interconnection Trunks
- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Fully Mechanized	95% Returned
• Partially Mechanized	95% Returned
• Non-Mechanized	95% Returned
• Local Interconnection Trunks	95% Returned

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WC Docket No. 04313
Ainsworth/Milner Exhibit BLS-13
Ordering

Kentucky TRO Measures

SEEM Measure

SEEM	Tier I	Tier II
Yes		X

FOCRC: Firm Order Confirmation and Reject Response Completeness

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HCT: Coordinated Customer Conversions – Hot Cut Timeliness Percent within Interval

Definition

This report measures the percentage of orders where BellSouth begins the conversion of a loop on a coordinated and/or a time specific order within a timely manner of the CLEC requested start time.

Exclusions

- Any order canceled by the CLEC
- Delays caused by the CLEC
- Loops where there is no existing subscriber loop and loops where coordination is not requested
- Subsequent loops on multiple loop orders after the first loop
- Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R or T)
- Listing Orders

Business Rules

The cut is considered "on time" if it starts <= 15 minutes before or after the requested start time. If a cut involves multiple lines, the cut will be considered "on time" if the first line is cut within the "on time" interval. If Integrated Digital Loop Carrier (IDLC) is involved, BellSouth must notify the CLEC by 10:30 AM on the day before the due date and then the "on time" interval is <= 2 hours before or after the requested start time.

Calculation

Percent within Interval = (a / b) X 100

- a = Total number of coordinated unbundled loop orders converted "on time"
- b = Total number of coordinated unbundled loop orders for the reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Product Reporting Level	
• Non-IDLC	95% Within + or – 15 minutes of Scheduled Start Time
• IDLC	95% within + or – 2 hours of scheduled start time

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

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CNDD: Non-Coordinated Customer Conversions - Percent Completed and Notified on Due Date

Definition

This report measures the percentage of non-coordinated conversions that BellSouth completed and provided notification to the CLEC on the due date during the reporting period.

Exclusions

- CLEC Canceled Service Orders
- Delays Caused by the CLEC
- Order activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Test Orders, etc., which may be order types C, N, R, or T)

Business Rules

The order is considered successfully completed if the order is completed on the due date and the CLEC is notified on the due date.

Calculation

Percent Completed and Notified on Due Date = (a / b) X 100

- a = Total number of non-coordinated conversions completed on the due date with CLEC notification
- b = Total number of non-coordinated conversions for the reporting period

Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - State

SQM Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Non-Coordinated Conversions	95% Completed on Due Date with CLEC Notification

SEEM Measure

SEEM	Tier I	Tier II
Yes	X	X

WC Docket No. 04-313
CC Docket No. 01-338

Ainsworth, Milner and Varner Affidavit

Exhibit BLS - 13

Table B-1: Tier 1 Submetrics (Continued)

Item No.	Submetric
813	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE Digital Loops ≥ DS1
814	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE Switch ports
815	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE Combo Other
816	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE xDSL (ADSL, HDSL, UCL)
817	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE ISDN (includes UDC)
818	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE Line Sharing
819	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – Local Transport
820	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE Line Splitting
821	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE Other Design
822	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – UNE Other Non-Design
823	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch < 10 – EELs
824	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch Dispatch in < 10 – UNE Loop and Port Combo
825	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion Non-Dispatch Switch Based < 10 – UNE Loop and Port Combo
826	P-9 Percent Provisioning Troubles w/in 30 days of Service Order Completion – Local Interconnection Trunks
827	P-13B: LNP – Percent Out of Service < 60 Minutes – LNP
828	P-13C: LNP – Percentage of Time BellSouth Applies the 10-digit Trigger Prior to the LNP Order Due Date – LNP – (Standalone)
829	P-13D: LNP – Average Disconnect Timeliness Interval & Disconnect Timeliness Distribution (Non-Trigger) • LNP (Normal Working Hours and Approved After Hours) • LNP (Unscheduled After Hours Ports)
830	TGP-2 Trunk Group Performance CLEC Specific
831	P-7E: Non-Coordinated Customer Conversions - % Completed and Notified on Due Date

Table B-2: Tier 2 Submetrics (Continued)

872	PO-1 Loop Makeup – Average Response Time - Manual
873	PO-2 Loop Makeup – Average Response Time - Electronic
874	TGP-2 Trunk Group Performance CLEC Specific
875	P-7E Non-Coordinated Customer Conversions - % Completed and Notified on Due Date